



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 23 2015

CERTIFIED MAIL 7009 1680 0000 7679 6477
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

Mr. John Manderscheid
Facility Support Manager
Hutchinson Technology Incorporated
2435 Alpine Road
Eau Claire, Wisconsin 54703

Re: Notice of Violation
Compliance Evaluation Inspection
WIR000002840

Dear Mr. Manderscheid:

On February 4, 2015, a representative of the U.S. Environmental Protection Agency inspected Hutchinson Technology, Inc. located in Eau Claire, Wisconsin (hereinafter "HTI," "facility," or "you"). As a large quantity generator of hazardous waste, HTI is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* ("RCRA"). The purpose of the inspection was to evaluate HTI's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by HTI, EPA's review of records pertaining to HTI, and the inspector's observations, EPA has determined that HTI has unlawfully stored hazardous waste without a license or interim status as a result of HTI's violation of certain requirements for a license exemption under Wis. Admin. Code §§ NR 662.034(1)-(3). EPA has identified the license exemption requirements violated by HTI in paragraphs 1 and 2, below.

STORAGE OF HAZARDOUS WASTE WITHOUT A LICENSE OR INTERIM STATUS

HTI violated the following large quantity generator license exemption requirements:

1. Hazardous Waste Contingency Plan Amendment

Under Wis. Admin. Code §§ NR 662.034(1)(d) and 665.054(3) [40 CFR §§ 262.34(a)(4); 265.54(c)], a hazardous waste contingency plan shall be reviewed, and immediately amended whenever the facility changes – in its design, construction, operation, maintenance, or other circumstances – in a way that materially changes the response necessary in an emergency.

In follow-up communication after the inspection, HTI provided a copy of its “Hazardous Waste Contingency Plan and Emergency Procedures” plan dated 10/22/2013. The plan is written to comply with the hazardous waste contingency plan requirements in Subchapter D of Wis. Admin. Code Chapter NR 665 [Subpart D of 40 CFR Part 265].

Section 4 of the plan describes HTI’s evacuation procedures and references an attached exit map. However, the exit map provided still denotes evacuation routes and shelter areas in Building 1, which has been leased for use by a company independent of HTI since the spring of 2014. HTI no longer has operations in Building 1. Similarly, a map of the locations of emergency equipment on site still displays a variety of emergency equipment available in Building 1. HTI failed to amend its hazardous waste contingency plan in response to changes in facility operations.

2. Content of Hazardous Waste Contingency Plan

Under Wis. Admin. Code §§ NR 662.034(1)(d) and 665.052(5) [40 CFR §§ 262.34(a)(4); 265.52(e)], a hazardous waste contingency plan shall include an up-to-date list of all emergency equipment at the facility such as fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. The contingency plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

In follow-up communication after the inspection, HTI provided a copy of its “Hazardous Waste Contingency Plan and Emergency Procedures” plan dated 10/22/2013. The plan is written to comply with the hazardous waste contingency plan requirements in Subchapter D of Wis. Admin. Code Chapter NR 665 [Subpart D of 40 CFR Part 265].

Section 6 of the plan describes the emergency equipment HTI keeps on site, and provides a list of the personal protective and emergency response equipment available for use. However, the plan does not provide a physical description of the equipment or provide a brief outline of the capabilities of each type of equipment. HTI failed to provide the necessary content in its hazardous waste contingency plan.

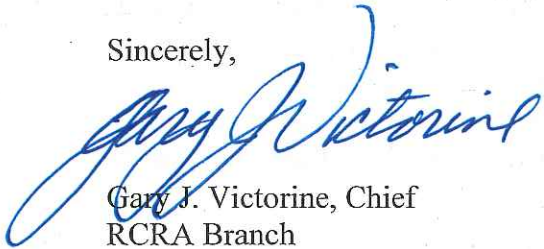
Summary: By violating the requirements for a license exemption, above, HTI became an operator of a hazardous waste storage facility, and was required to obtain a Wisconsin hazardous waste storage license. HTI failed to apply for such a license. HTI’s failure to apply for and obtain a hazardous waste storage license violated the requirements of Wis. Admin. Code §§ NR 680.30, 680.31, and 680.32 [40 CFR §§ 270.1(c), and 270.10(a) and (d)].

At this time, EPA is not requiring HTI to apply for a Wisconsin hazardous waste storage license so long as it immediately establishes compliance with the conditions for a license exemption outlined in paragraphs 1 and 2 above.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken to establish compliance with the above conditions. You should submit your response to Brian Kennedy, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.” “

If you have any questions regarding this letter, please contact Mr. Kennedy, of my staff, at (312) 353-4383 or at kennedy.brian@epa.gov.

Sincerely,

A handwritten signature in blue ink, reading "Gary J. Victorine".

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Troy Gansluckner, WI DNR, troy.gansluckner@wisconsin.gov
Michael Ellenbecker, WI DNR, michael.ellenbecker@wisconsin.gov



U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 5, Land and Chemicals Division
RCRA Branch, LR-8J
77 West Jackson Boulevard
Chicago, Illinois 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSPECTION DATE: February 4, 2015

SITE NAME: Hutchinson Technology, Inc.

ADDRESS: 2435 Alpine Road
Eau Claire, Wisconsin 54703

EPA ID NUMBER: WIR000002840

GENERATOR STATUS: Large Quantity Generator (2014)

NAICS CODE: 33411 Computer and Peripheral Equipment Manufacturing

FACILITY CONTACT: John Manderscheid
Facility Support Manager

EPA INSPECTOR: Brian Kennedy
Environmental Engineer
Compliance Section 2
RCRA Branch
Land and Chemicals Division

PREPARED BY:


Brian Kennedy

3/5/2015
Date

ACCEPTED BY:


Julie Morris, Chief
Compliance Section 2

3/10/15
Date

Purpose of Inspection

An unannounced Compliance Evaluation Inspection (CEI) of Hutchinson Technology, Inc. (hereinafter "HTI" or "facility") located at 2435 Alpine Road, Eau Claire, Wisconsin took place on February 4, 2015. The CEI was conducted by U.S. Environmental Protection Agency personnel and was an evaluation of the facility's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA) and its implementing regulations found in the Wisconsin Administrative Code and the Code of Federal Regulations. More specifically, the CEI was an evaluation of HTI's compliance with the regulations governing large quantity generators of hazardous waste.

Participants

The following persons were present for part or all of the inspection:

Korey Klammer – Safety Coordinator	HTI
Emily Nicolai – Chemical Services Supervisor	HTI
Joel Brunzlick – Chemical Services Coordinator Lead	HTI
John Manderscheid – Facility Support Manager	HTI
Brian Kennedy – Environmental Engineer	U.S. EPA

Introduction

I arrived on site at 9:45 AM CST and used a visitor entrance telephone to contact the HTI receptionist and request the environmental coordinator. The receptionist connected me to Mr. Korey Klammer, HTI's Safety Coordinator, who with Ms. Emily Nicolai, HTI's Chemical Services Supervisor, allowed me into the building for an opening conference. Mr. Klammer and Ms. Nicolai led me to the second floor to sign in with the front desk and then to a nearby conference room where we were joined by Mr. Joel Brunzlick, HTI's Chemical Services Coordinator Lead. I presented Mr. Klammer my enforcement officer credentials and business card and provided the Small Business Resources information and Pollution Prevention contact sheets. I described the purpose of the U.S. EPA RCRA inspection and the process by which I would conduct the inspection, including a facility walk-through which would include photographs of hazardous waste storage areas, as well as a review of HTI records pertaining to hazardous waste.

Mr. Klammer informed me that HTI's primary environmental coordinator was at Hutchinson Technology's location in Hutchinson, Minnesota the day of the inspection. Mr. John Manderscheid, HTI's Facility Support Manager, also joined the opening conference.

I informed HTI of their right to make a confidential business information claim for the information and documents collected during the inspection.

Site Description

The following information about HTI is based on personal observations of the EPA inspector and on representations made during the inspection by facility personnel identified above or within the text unless otherwise specified.

Opened in 1995, HTI's 850,000 square foot facility in Eau Claire, Wisconsin specializes in the manufacture of suspension assemblies for computer hard disk drives as well as optical image stabilizers (OIS) for cell phone cameras. HTI's suspension assemblies are used in hard drives manufactured by brands such as Hitachi, Seagate, Toshiba and Western Digital for use in desktops and notebooks. The suspension assembly itself is the hard drive component that keeps the actuator arm at the necessary distance above the hard disk platter, allowing the recording head to effectively read and write data to the hard drive. HTI's OIS devices utilize a special alloy that changes shape when exposed to an electric current, causing the cell phone camera lens to move and focus on an image for a higher quality picture. HTI currently has over 500 employees on site, with manufacturing employees generally working 12-hour shifts, seven days a week, and office employees working one shift, Monday through Friday.

HTI is split into four main buildings, Buildings 1 through 4, which are labeled sequentially moving west to east. Although HTI originally used all of these buildings, the company recently shifted its assembly operations in Building 1 to a new location in Thailand. In the spring of 2014, HTI leased much of the space in Building 1 to Riverside Technologies, Inc., a wholly separate corporation. As a result of this shift, HTI no longer has any assembly operations on site.

Building 2 houses HTI's photoetching process and portions of the now-discontinued "Trace" manufacturing process, as well as several quality assurance and maintenance areas. The photoetching process is used to manufacture fine components for both suspension assembly and OIS products using a ferric chloride etchant. The Trace process, which also extends into Building 3, has since been replaced by a process known as "TSA+." The TSA+ process is housed primarily in Building 4, although portions of the process extend into Building 3 as well. The TSA+ process, which produces the flexure component of HTI's suspension assemblies, incorporates a variety of metal treatment processes from laser ablation and polymer coating to copper, nickel and gold electroplating and chemical etching. Because the Trace process was replaced by TSA+, the eastern half of Building 2 and the western half of Building 3 are currently used as storage spaces for unused equipment and scrap materials.

Much of the hazardous waste generated by HTI originates in the electroplating operations in the TSA+ process. This includes a variety of D002 acidic plating baths, cleaning baths, etching solutions, filters, residues and sludges, F006 wastewater treatment filter press sludge, and F007 gold-bearing cyanide solutions. Many of the liquid electroplating wastes (acids and etching solutions, etc.) are drained from the TSA+ area to the basement of Building 4 for storage. The basement of Building 4 also houses HTI's wastewater treatment system, which also treats waste solutions from the TSA+ process, and is the point of generation for F006 filter cake.

Hazardous wastes are stored in two 90-day areas in the basement of Building 4. The first 90-day area lies along the northern wall of the Building 4 basement and is used to store totes of F006 hazardous waste filter cake that are scheduled for later shipment. The second 90-day area is a

separate storage room that, despite being part of Building 4, is only accessible from the basement of Building 3. This 90-day room is used to store the various hazardous wastes that are generated from electroplating operations and other processes throughout the site, including the liquid wastes that are drained from the TSA+ process. Just outside this 90-day room, HTI stages totes of F006 that are scheduled for immediate pickup. Adjacent to the staged totes is HTI's dedicated universal waste storage area, which is organized to collect spent lamps, batteries, ballasts, and other electronic wastes. HTI also generates small amounts of used oil which is stored in drums in the basement of Building 2, near a larger product chemical storage area.

The majority of the hazardous wastes generated by HTI are transported by Nexeo Solutions of Dublin, Ohio to either Tradebe Treatment and Recycling in East Chicago, Indiana or WRR Environmental Services in Eau Claire. Certain wastes, such as F006 sludge and F007 solutions are sent to Peoria Disposal in Peoria, Illinois or Sipi Metals Corp. in Chicago for metal recovery. In addition to transporting its hazardous waste, Nexeo Solutions also acts to characterize and profile HTI's waste streams.

Certain HTI employees are provided phones to communicate throughout the facility. HTI has a facility-wide alarm and PA system and the office and production areas are fitted with sprinkler systems. Other fire prevention equipment, including extinguishers, are located throughout the facility and are serviced on a yearly basis by a fire safety contractor. The local fire department visits HTI two to three times per year for walk-throughs.

Facility Walk-Through

Mr. Manderscheid and Mr. Klammer led the tour of HTI. Ms. Nicolai and Mr. Brunzlick also joined the tour. Mr. Manderscheid led us first to a tooling room off of the main production floor in Building 2. I asked about the dust collector observed in the room. An employee in the area said the dust collector accumulated metal fines that are generated during the use of several mills in the room. He pointed out the ductwork that led from the drum to several of the machines. He said he was unsure when the drum had last been emptied, but that the material was not managed as a hazardous waste.

The tour continued to the photoetching area in the northwest corner of the main production floor of Building 2. There was little activity in the area. Mr. Klammer explained that much of the production capacity that used to occupy this area had been moved to the Hutchinson, Minnesota location or the new facility in Thailand. I observed a 55-gallon satellite accumulation drum in the area that was labeled as hazardous waste. Mr. Brunzlick opened the drum to see its contents but it was empty. He stated the drum actually belonged in a separate production area, and was just misplaced. Mr. Manderscheid led us to a nearby maintenance room. There was a small bucket in the room that was used to collect acetone and IPA-contaminated rags. Mr. Klammer explained that HTI has characterized its solvent wipes as non-hazardous waste. Adjacent to the maintenance room was another room referred to as the "metrology" area. Here, HTI conducts fine measurements of its products. There was another small bucket in the room that was used to collect acetone and IPA-contaminated wipes, but this bucket was marked as hazardous waste (See Photo 1 in Attachment A: Inspection Photographs). Mr. Klammer reiterated that HTI's solvent wipes were not hazardous waste, and that the bucket was mislabeled.

Mr. Manderscheid led the tour to the southwest corner of the main floor in Building 2 where HTI houses its photoresist wet process. Here, HTI conducts ferric chloride etching of components used in both its suspension assemblies and OIS devices. Moving through the etching area I observed several more buckets that were used to collect solvent-contaminated wipes. None of these buckets were labeled as hazardous waste. Mr. Klammer explained that these buckets are used throughout much of HTI and when they are full, they are emptied into large boxes that are kept in a flammables storage room in another part of Building 2. Past the etching area, the southern portion of Building 2 houses several different quality assurance testing laboratories, known as "MIC" areas. Each MIC area is a clean room and requires employees to wear a smock, hairnet and face mask. I observed the MIC rooms through windows from the main production floor. There were several more solvent-contaminated wipe buckets in each MIC room, but no hazardous wastes.

The tour continued into Building 3, the western half of which previously housed the Trace production process. The Trace process has since been replaced by the TSA+ process, a portion of which occupies the eastern half of Building 3. The inactive portion of Building 3 now stores old production equipment, scrap materials, and acts as a central accumulation area for recyclable wastes (plastic sheeting, paper wastes, etc.). Mr. Manderscheid described some of the inactive equipment in the area, including plasma etchers and electroplating units. There were no hazardous wastes observed in the former Trace process areas. Another MIC area at the southern portion of Building 3 was observed. There were again several buckets in the area used to accumulate solvent-contaminated wipes.

Before entering the TSA+ process area, which is a clean area, we had to don the necessary smocks, hair nets, gloves, and face masks. Mr. Manderscheid then led the tour into Building 4 and the eastern half of Building 3 to give a brief overview of the entire TSA+ process. He described the equipment and processes used in TSA+ to make certain parts of HTI's suspension assemblies. These processes included, in approximate order, the aqueous cleaning of the product substrate, application of an insulator and lamination, developing, application of the design imprint, electroplating, dry film stripping, chrome etching, and nickel and gold plating.

I observed the copper plating baths in more detail when walking through the TSA+ area. The product substrate moves through the plating baths as a continuous reel from bath to bath, as opposed to more traditional plating methods where the product is dipped, raised, and transferred to the next bath. Mr. Manderscheid and Mr. Klammer explained this plating method and showed where the product substrate, rolled around a spool, is loaded into the plating line feed mechanism. I asked about waste from the copper plating line and was told that the actual plating baths are regenerated whenever possible, while cleaning and rinse baths from the line are drained to the wastewater treatment system in the basement of Building 4 on a regular basis. Plating bath filters from electroplating operations are also generated and accumulated in the basement. Similarly, waste etching solution from the chrome etching line and waste plating baths from the nickel gold plating line are drained to the basement for collection and disposal.

After touring the TSA+ process, the tour continued to the basement of Building 4 where hazardous wastes from the TSA+ process are accumulated. At the southern wall of Building 4's basement, Mr. Brunzlick explained the waste streams that were accumulating from the floor

above. There was a hazardous waste satellite accumulation drum in the area that was collecting spent chrome etchant from a temporary holding tank (See Photo 2). The drum was labeled and was dated two days prior to the inspection. Near the chrome etchant drum was a second satellite accumulation container that was collecting waste chrome etch filters and other solids (See Photo 3). The drum was also labeled as hazardous waste. Moving north through the basement there were several more waste accumulation areas, including satellite drums accumulating hazardous waste copper plating bath liquids and copper plating bath/nickel strike filters and solids (See Photos 4 and 5). Both drums were closed and labeled.

After viewing the TSA+ waste accumulation areas, I asked to see the nearby wastewater treatment system. I spoke with the wastewater treatment manager and asked to see the filter press. He led the tour to the filter press and then to an adjacent room where hoppers are taken to transfer the filter cake into supersacks via a top-loading granulator. There were several containers of F006 filter cake in the area, two of which were open (See Photo 6). They were all labeled as hazardous waste. The wastewater treatment manager explained that the filter cake was being allowed dry in the open air, a practice which allows more filter cake to be added at a later time and to fill each container as much as possible. He also estimated that eight to ten containers of filter cake are sent off-site every week.

The tour continued to HTI's first 90-day area along the north side of Building 4's basement. There were two supersacks of hazardous waste filter cake in the area (See Photo 7). Both containers were dated and labeled. Continuing west into Building 3, Mr. Brunzlick led the tour to the second 90-day storage area, a separate room off the larger floor space used to accumulate electroplating and other drummed wastes. There were approximately 30 drums in the area stacked on pallets and shelves (See Photos 8 and 9). All drums were labeled and dated. A sprinkler system in the room is visible in both Photos 8 and 9. Just outside of this 90-day room, HTI had staged eight supersacks of hazardous waste filter cake that were waiting for shipment (See Photo 10). These containers were also labeled and dated. HTI's universal waste storage area was adjacent to the staged containers and consisted of several labeled shelves and containers for various batteries and lamps (See Photo 11). All containers in the area were labeled and accumulation start dates were established.

Mr. Brunzlick led the tour to a small used oil storage area in another area of Building 3's basement. There were two containers storing used oil and used oil-contaminated rags and filters (See Photo 12). The containers were labeled as "Used Oil."

The tour ended in HTI's Flammables Room, a storage area on the western side of the first floor of Building 2. Here, HTI was storing a variety of product chemicals and solvents, as well as waste solvent-contaminated wipes. There were two large boxes of waste wipes in the room. The boxes were labeled for DOT shipment and as non-hazardous waste. There were two hazardous waste satellite accumulation drums in the room, one of which was accumulating glycol ether/acetate photo resist thinner waste and the other waste IPA and acetone solvents. Both drums were closed and labeled as hazardous waste.

The inspection broke for lunch at 12:15 PM. I returned to HTI at 1:15 PM for a records review.

Record Review

I requested the following HTI records for review:

- Hazardous waste manifests and related land disposal restriction forms for the previous three years for HTI's hazardous waste
- Annual hazardous waste reports as submitted to WDNR for the previous three years
- Waste characterization or determination records for HTI's waste streams
- HTI's hazardous waste contingency plan or integrated plan
- Personnel training records for the previous three years
- Hazardous waste transfer logs that track the arrival and removal of customer waste

Several diagrams of HTI's second, first, and basement floors are in Attachment B.

I reviewed hazardous waste manifests from 2012 through the first month of 2015. All manifests reviewed appeared complete and signed and dated as required. Land disposal restriction notification forms were also available for individual waste streams. Most of the manifests reviewed displayed the shipment of HTI's hazardous waste to Tradebe or WRR Environmental. The most common waste codes entered on HTI's manifests included D001, D002, D007, F003, F006 and F007.

Mr. Klammer provided a folder containing HTI's waste profiles for its non-hazardous and hazardous waste streams. The profiles agreed with the hazardous waste that was observed on site, including waste IPA and acetone solvents (D001), nickel plating wastes (D002), and filter cake (F006). Mr. Manderscheid was able to pull up a TCLP result on his cell phone for the material accumulating in the dust collector in the tooling room in Building 2. The material was characterized as non-hazardous waste.

HTI had yet to complete its 2014 Hazardous Waste Annual Report at the time of the inspection, but the 2013 and 2012 reports were available and reviewed. In the 2013 report, HTI notified as a Large Quantity Generator in 2013 and 2014. By weight, the largest hazardous waste streams generated by HTI in 2013 were F006 filter cake, D002 copper plating bath liquids, and D002 chrome etching liquids. The 2013 report is provided in Attachment C.

Mr. Klammer explained HTI's employee training system and provided several examples of electronic employee training records. These records display the course title, content, and start and completion dates for a variety of courses HTI employees are required to take. These courses include HAZWOPER refreshers, respirator fit testing and training, hazardous waste management refreshers, and lock-out/tag-out, among others. An example training record is in Attachment D.

Mr. Klammer provided copies of HTI's Risk Management Plan and an Off-Site Facility Plan (OFP) for review in lieu of a separate hazardous waste contingency plan. HTI's Risk Management Plan dealt mainly with the management and emergency response procedures related to the storage of chlorine on site, which is used to regenerate ferric chloride etchant. Hazardous waste did not appear to be mentioned in this plan. The OFP described the management and emergency response procedures related to the storage of product chemicals onsite. The OFP lists primary and alternate facility coordinators, contains a brief list of

emergency equipment on site, and provides several emergency evacuation maps. However, the plan was not written with respect to the prevention of releases of hazardous waste or response procedures related to hazardous waste emergencies. Instead, page 8 of the OFP only briefly mentions the storage of "flammable waste" in the Flammables Room and the second 90-day storage area as described in the narrative above. Mr. Klammer said it was possible that there was a more specific hazardous waste plan available, but that he was not sure where it would be located. The OFP is in Attachment E.

Closing Conference

I summarized my review of the site to Mr. Manderscheid, Mr. Klammer, Ms. Nicolai, and Mr. Brunzlick. I stated that my only concern was a lack of a dedicated contingency plan or other plan that meets the requirements for large quantity generators of hazardous waste. If HTI was able to locate the plan, I requested that they provide a copy. I explained that HTI would receive a report about the inspection as well as a summary of any issues that were identified. It was decided that Mr. Manderscheid would be the point of contact.

The inspection ended at approximately 2:30 PM.

Inspection Follow-Up

On March 3, 2015, I emailed Mr. Klammer to clarify the waste status of HTI's IPA and acetone-contaminated solvent wipes, which were recorded as D001 hazardous waste in its 2013 Annual Waste Report, but were managed as non-hazardous waste at the time of the inspection. I also requested a dedicated hazardous waste contingency plan, if one had been located.

On March 4, 2015, Mr. Klammer responded to the requests via email and provided copies of the waste profile and determination for HTI's solvent-contaminated wipes, as well as HTI's hazardous waste contingency plan. The contingency plan is provided in Attachment F.

Attachments

- A. Inspection Photographs
- B. Facility Diagrams
- C. 2013 Annual Waste Report
- D. Sample Training Record
- E. Off-Site Facility Plan
- F. Hazardous Waste Contingency Plan
- G. Inspection Checklists

ATTACHMENT A: Inspection Photographs

Photographs were taken by Brian Kennedy using a Canon PowerShot A2400 IS Digital Camera.

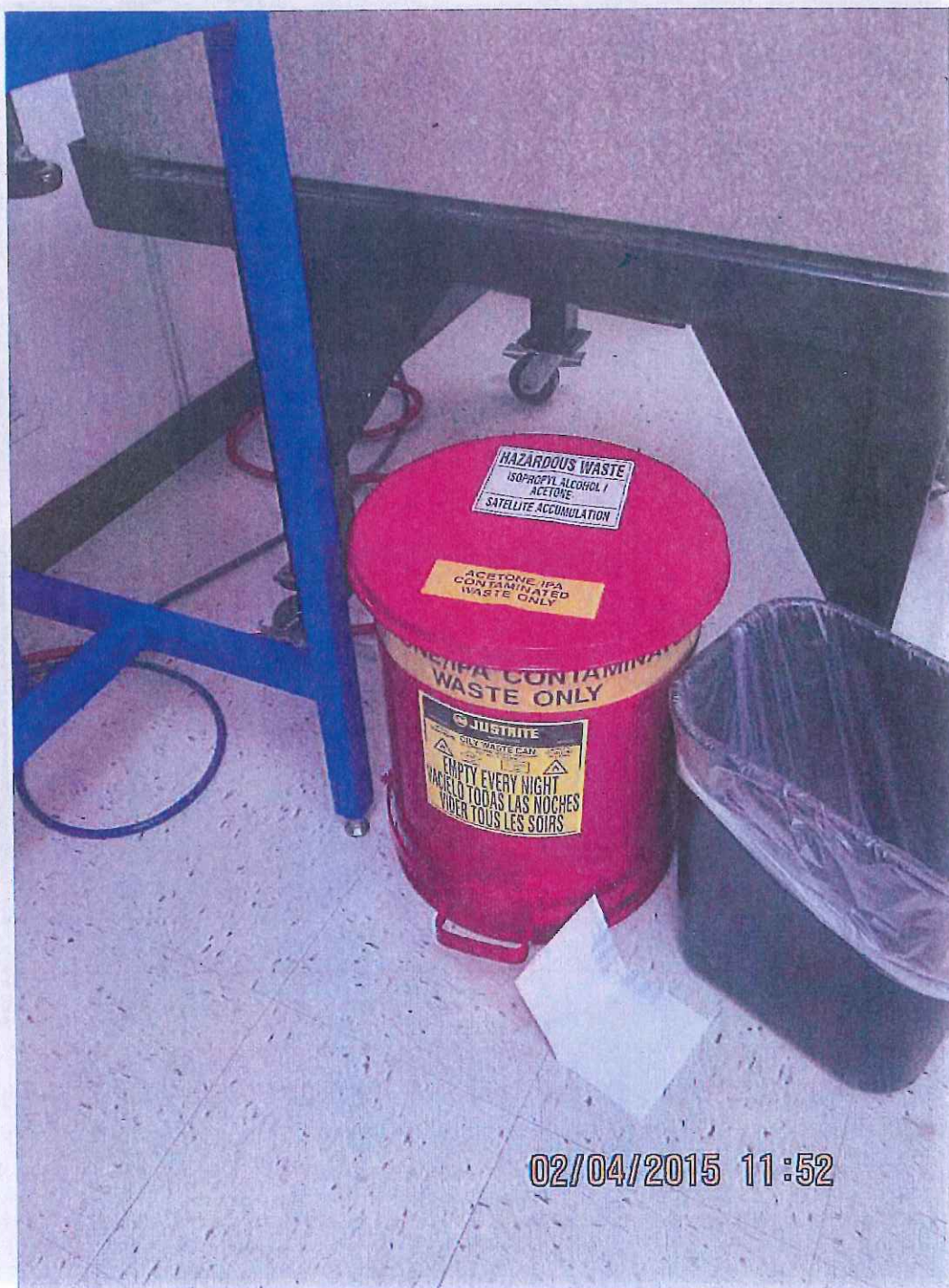


Photo 1: An incorrectly labeled container used to accumulate solvent-contaminated wipes in Building 2's metrology area. The solvent wipes are no longer managed as hazardous waste.



Photo 2: A satellite accumulation drum collecting hazardous waste chrome etchant in the Building 4 basement. The drum was closed and labeled.

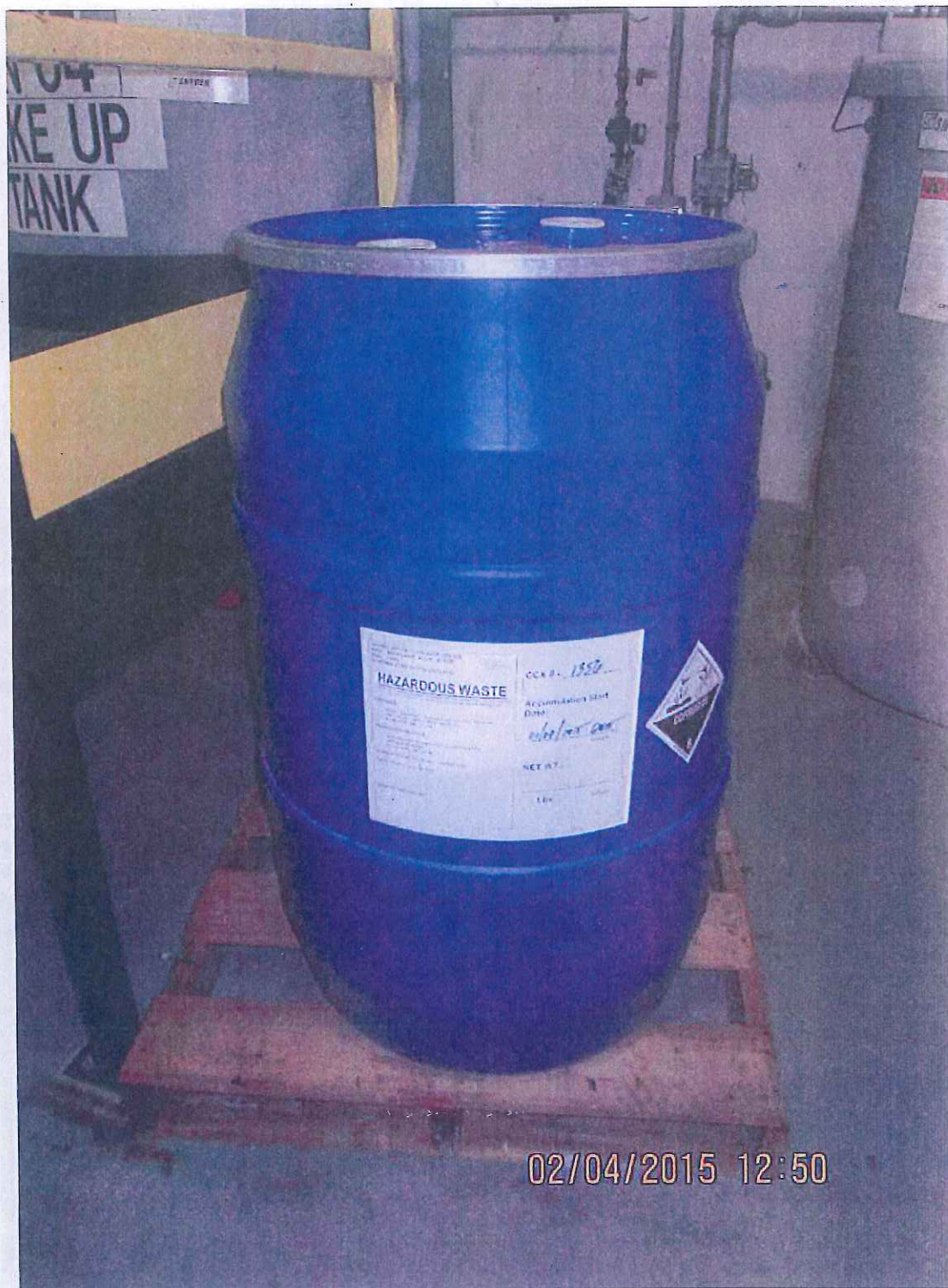


Photo 3: A satellite accumulation drum collecting hazardous waste chrome etchant filters and solids in the basement of Building 4. The drum was closed and labeled.

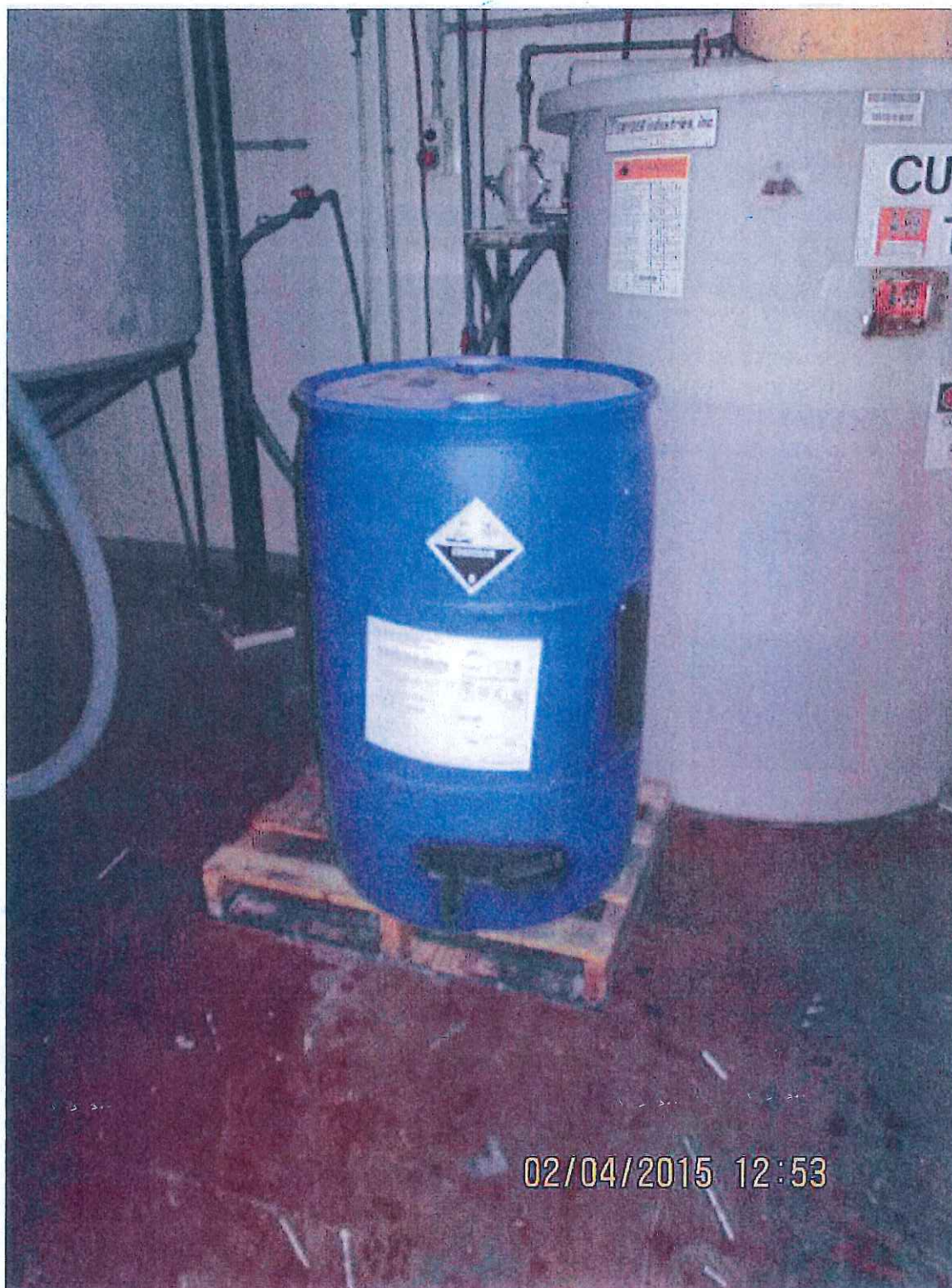


Photo 4: A satellite accumulation drum collecting hazardous waste copper bath plating liquids in the basement of Building 4. The drum was closed and labeled.

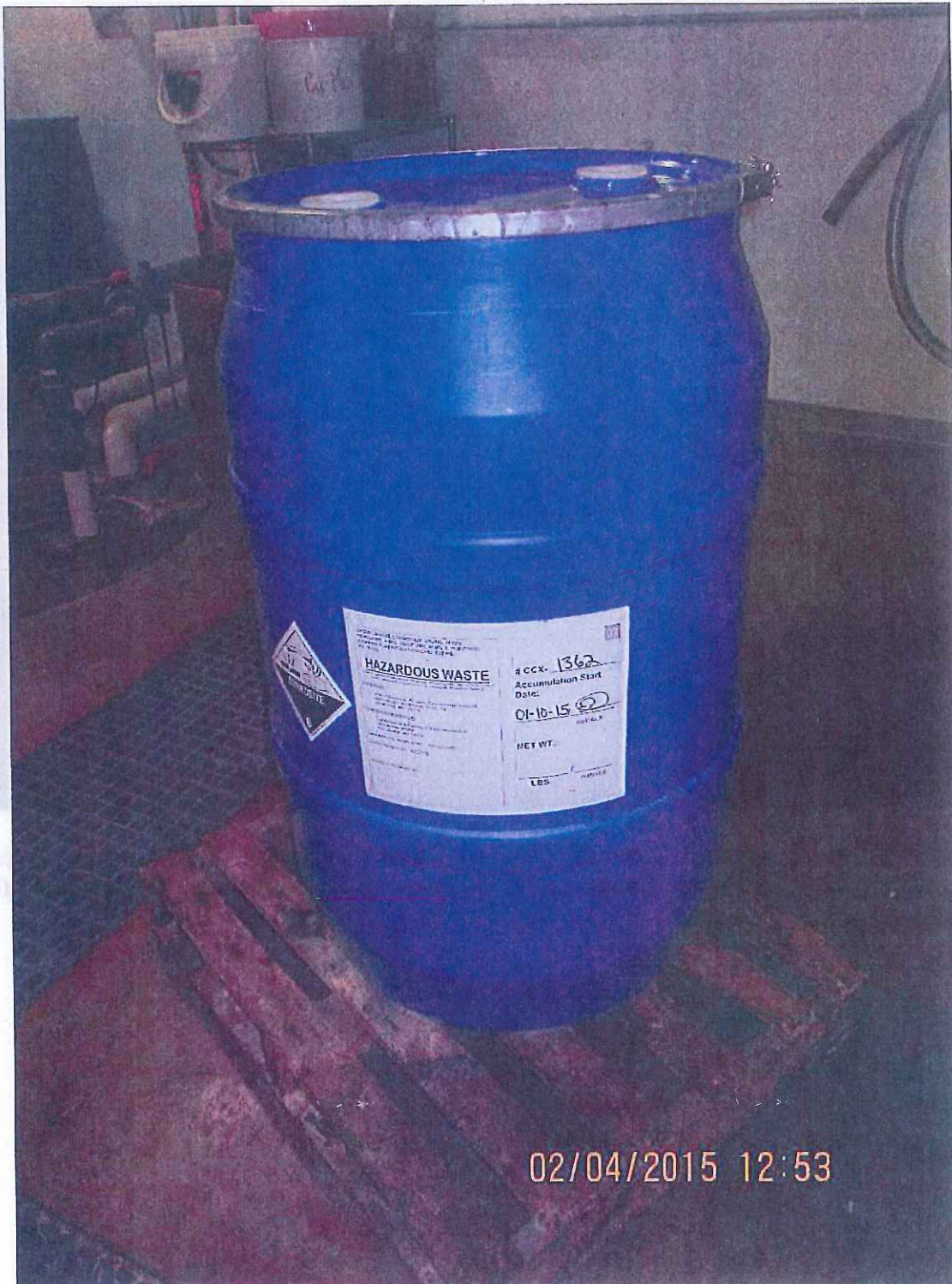


Photo 5: A satellite accumulation drum collecting hazardous waste copper plating bath and nickel strike solution filters in the basement of Building 4. The drum was closed and labeled.



Photo 6: Two supersack containers of F006 hazardous waste in the wastewater treatment area in the basement of Building 4. The waste was airing out to allow more waste to be added to the containers at a later time.



Photo 7: Two containers of F006 hazardous waste filter cake in HTI's 90-day storage areas in the Building 4 basement. The containers were both labeled and dated.



Photo 8: Pallets of hazardous waste drums in HTI's 90-day storage area off the basement floor of Building 3. All drums in the area were labeled and dated.



Photo 9: Additional pallets of hazardous waste drums in the 90-day storage area off the basement floor of Building 3. All drums were labeled and dated.



Photo 10: Supersacks of hazardous waste filter cake staged for shipment in the basement of Building 3. All containers were dated and labeled.

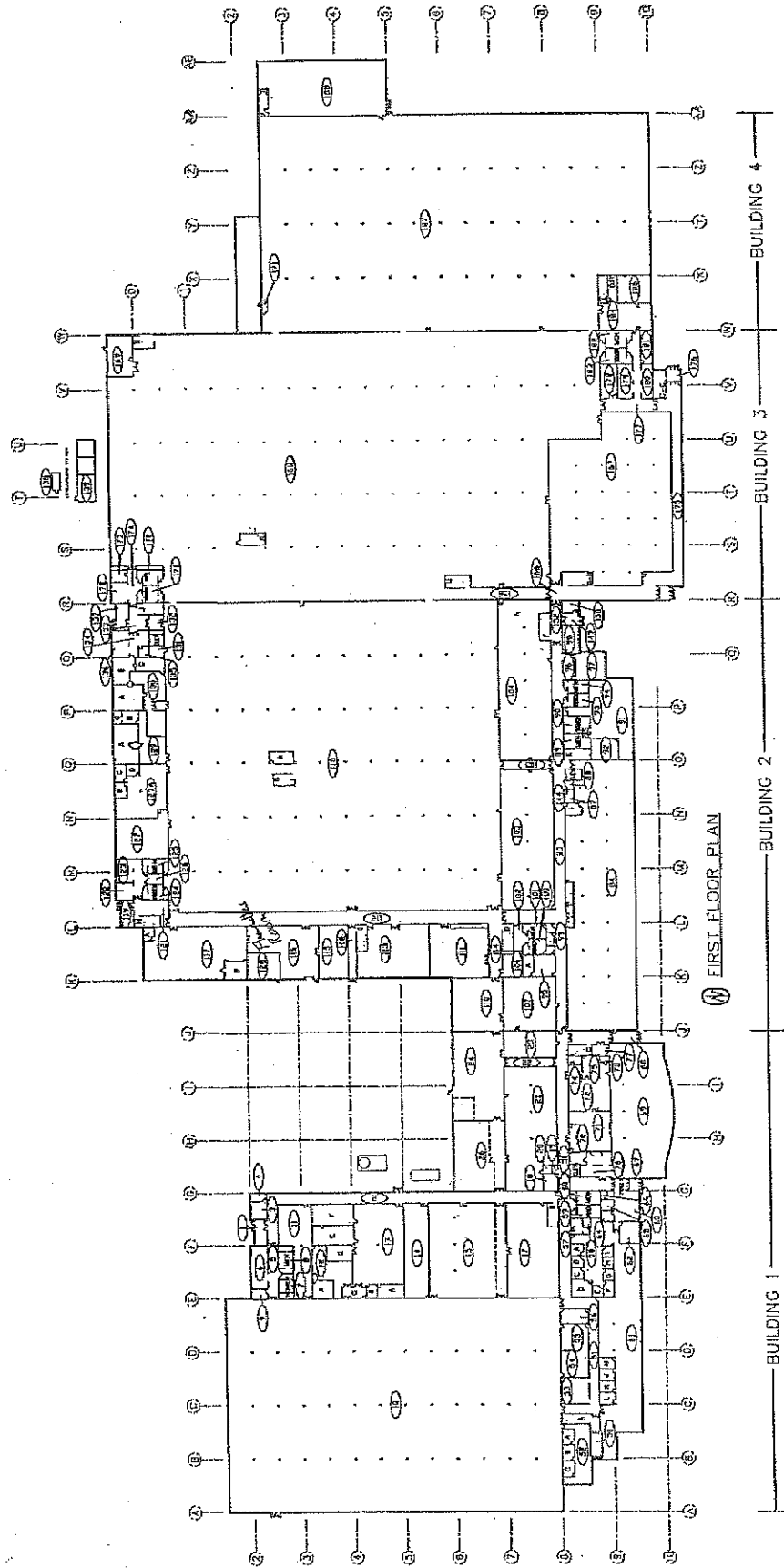


Photo 11: HTI's universal waste storage area in the basement of Building 3. Containers were all labeled and the accumulation start date was noted.



Photo 12: A small used oil storage area in the basement of Building 3. Containers of used oil and contaminated filters and rags were labeled as "Used Oil."

ATTACHMENT B: Facility Diagrams



① FIRST FLOOR PLAN

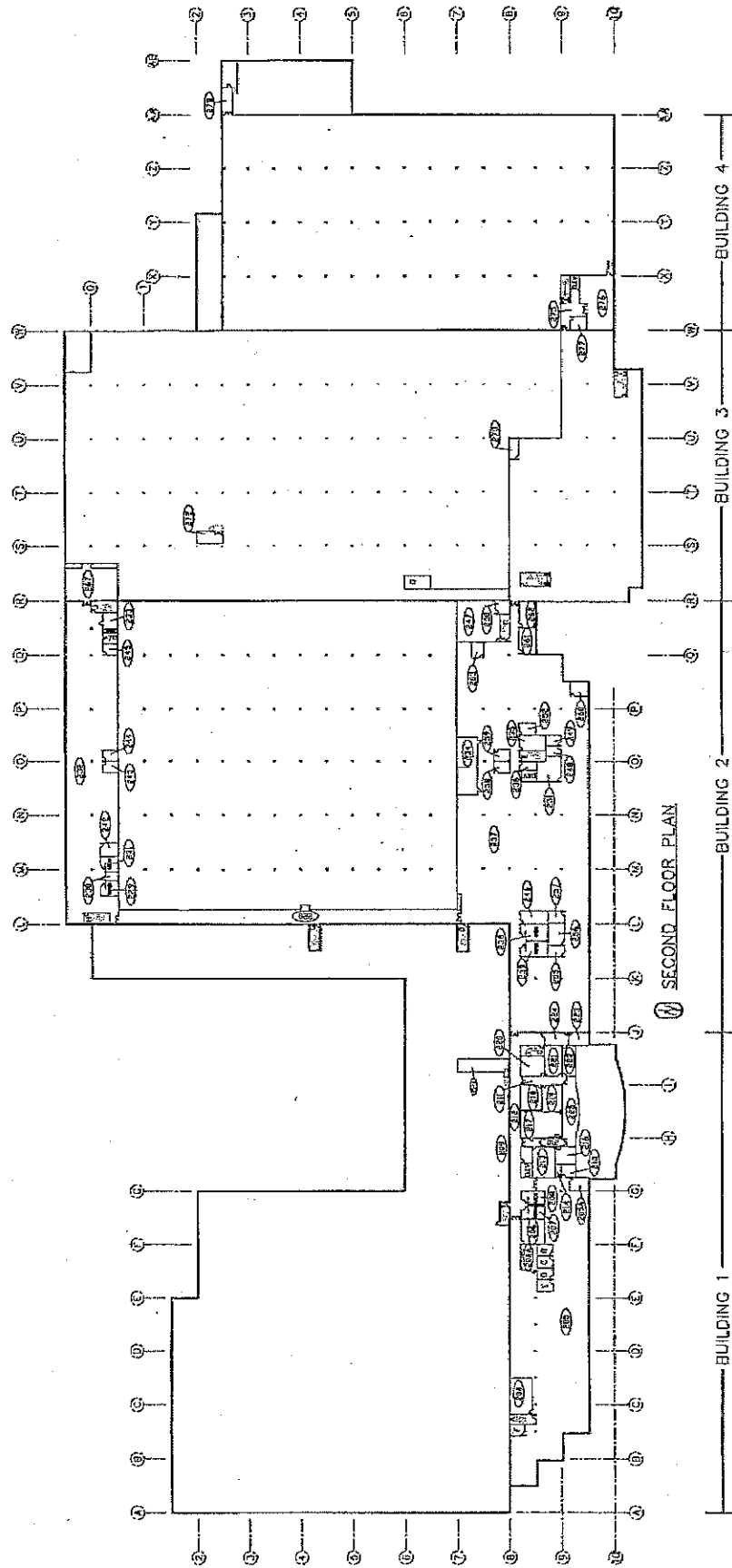
BUILDING 4

BUILDING 3

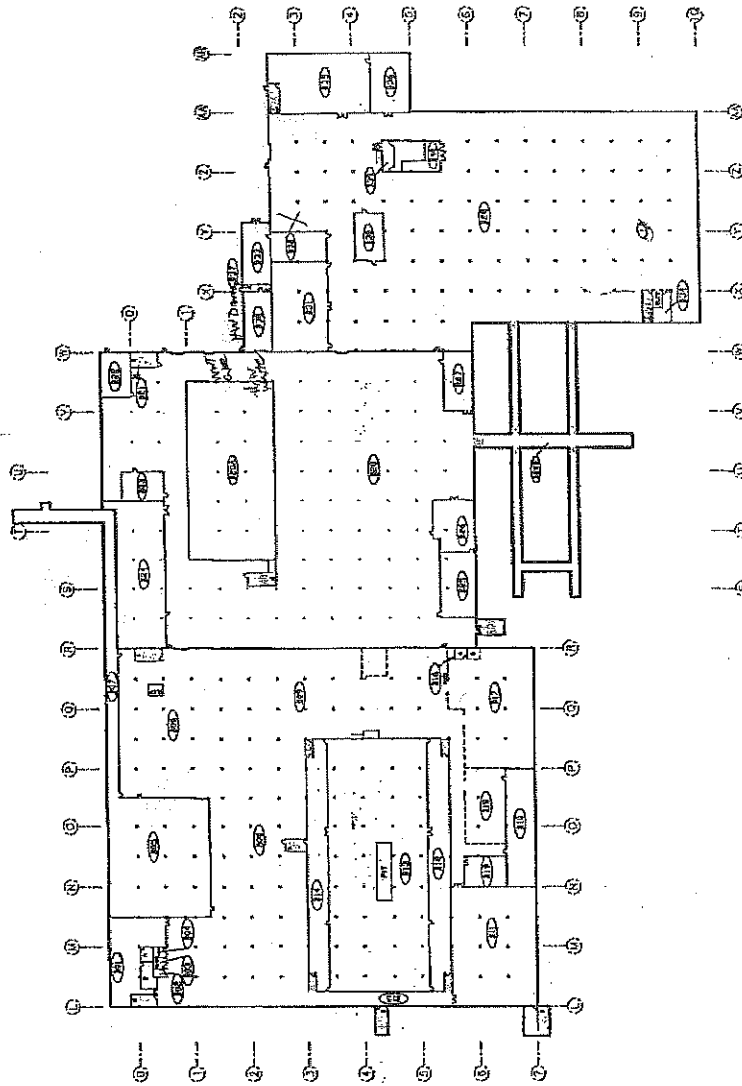
BUILDING 2

BUILDING 1

Hickman Engineering		BUILDING LAYOUT FIRST FLOOR	
EAU CLAIRE	05/07/2007 AS SHOWN	DATE	05/07/2007
BY: BWR	DATE: 05/07/2007	BY: BWR	DATE: 05/07/2007
PROJECT: BLDG-MASTER	PROJECT: BLDG-MASTER	PROJECT: BLDG-MASTER	PROJECT: BLDG-MASTER
FOR THE RECORD ONLY - NOT TO BE USED FOR CONSTRUCTION		FOR THE RECORD ONLY - NOT TO BE USED FOR CONSTRUCTION	



HARRISON TECHNOLOGY		DATE	09/11/2007	AS SHOWN
EAU CLAIRE		BY	BWR	BLDG-LAYOUT_2
HARRISON TECHNOLOGY		DATE	09/11/2007	AS SHOWN
EAU CLAIRE		BY	BWR	BLDG-LAYOUT_2

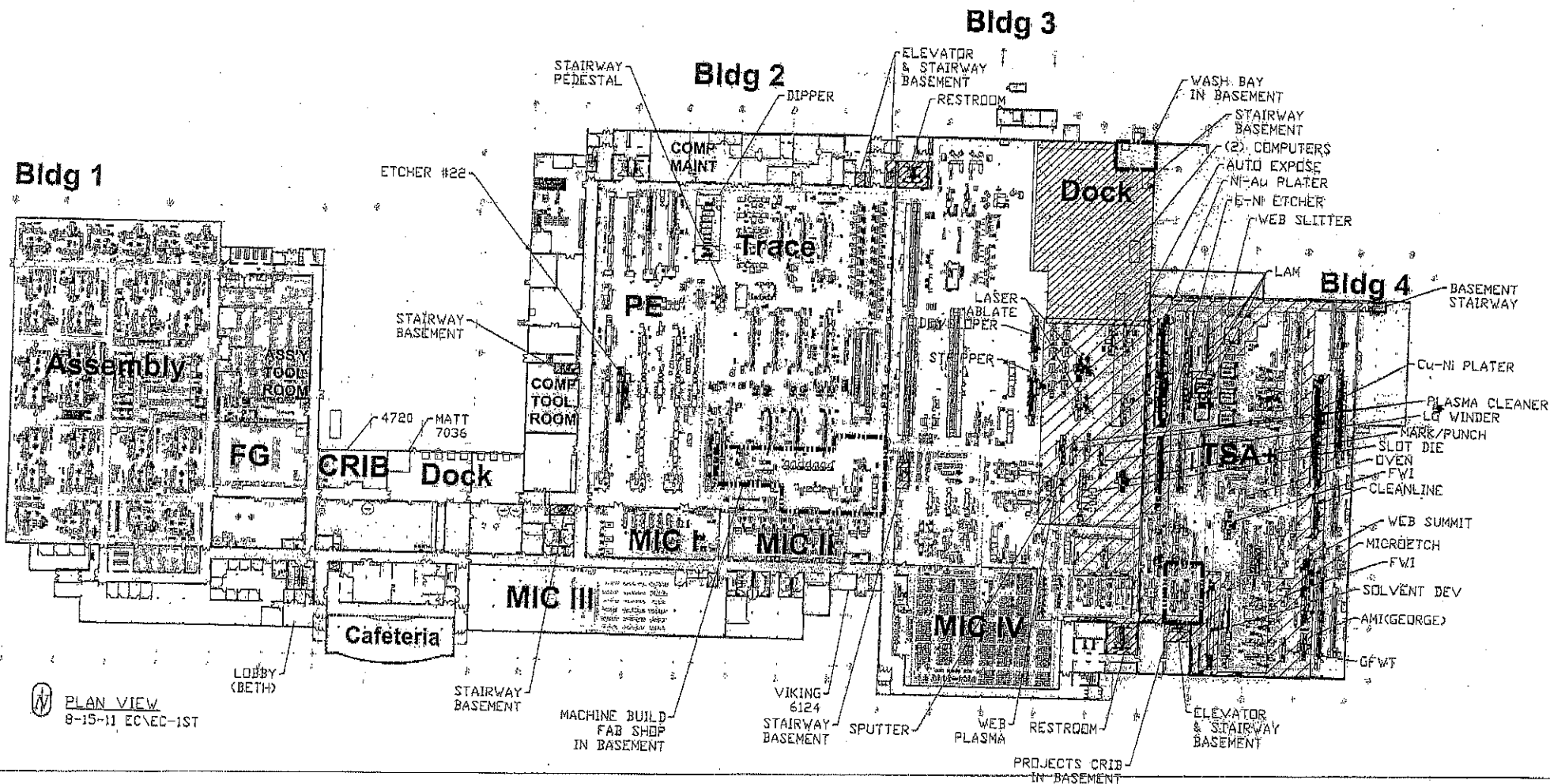


(M) BASEMENT FLOOR PLAN

BUILDING 2 BUILDING 3 BUILDING 4

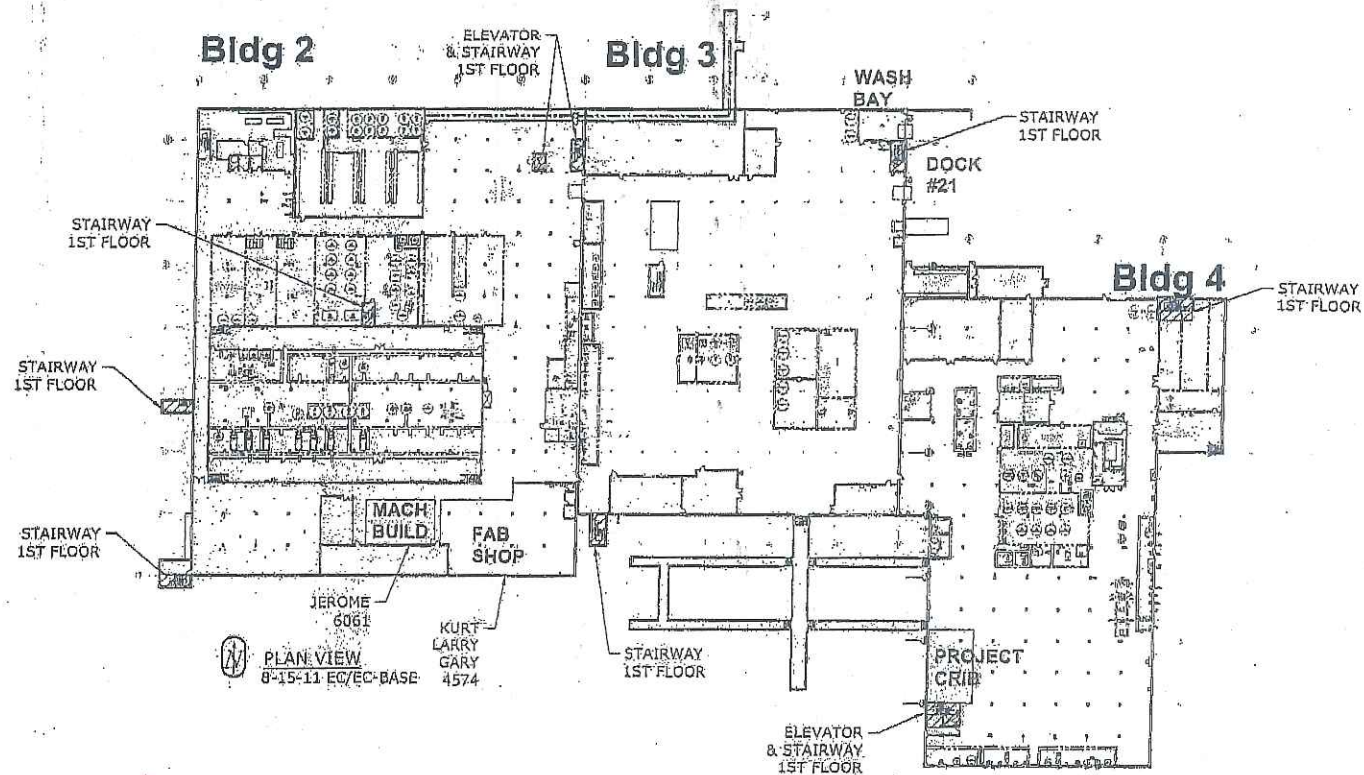
HATCHERSON TECHNOLOGY		BUILDING LAYOUT	
SAU CLAIRE		BASEMENT FLOOR	
HATCHERSON TECHNOLOGY, INC.		06/07/2007 AS SHOWN	
1000 PINE ST. SUITE 200		BLDG-MASTER	
TEL: 508.885.1100		BLDG-LAYOUT-B	

8-22-11



PLANNERS		
	HU	EC
JOEL PORTNER	5966	
PAUL VIESTENZ	1460	

HUTCH TRANSPORTATION		
	HU	ED
LARRY (PORKY) BUSKE	1241	
LYLE HENDRICKS		7712
TAMMY BEJO TRAV	1450	



ATTACHMENT C: 2013 Annual Waste Report

Hazardous Waste Report Certification

Hazardous Waste Reporting-WA/5
WI DNR
PO BOX 7921
Madison, WI 53707-7921

Site Name and Location

EPA ID : WIR000002840
Facility ID : 618076910
Site Name : HUTCHINSON TECHNOLOGY INC
Site Location: 2435 ALPINE RD
EAU CLAIRE, WI 54703

Primary NAICS Code : 33411

Mail Address :
2435 ALPINE RD
EAU CLAIRE, WI 54703

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted.

Based on my inquiry of the persons who manage the system, or those persons directly responsible for gathering the information, the information submitted, is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: DALE RUZICKA

Title: VICE PRESIDENT

Signature:

Date of Signature:

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FACILITY OWNER INFORMATION

Facility Owner Name: HUTCHINSON TECHNOLOGY INC
Owner Start Date 10/29/1985
Facility Owner Type: PRIVATE
Address 40 W HIGHLAND PARK
City, State Zip: HUTCHINSON, MN 55350
Country UNITED STATES
Telephone # and Ext.: 612-587-3797

Waste Report Certifier Information

Name/Title DALE RUZICKA VICE PRESIDENT
Phone and Ext. /FAX 320-587-1826
Email Address dale.ruzicka@hti.htch.com
Address 40 WEST HIGHLAND PARK DRIVE HUTCHINSON MN 55350-9784

Waste Contact Information

Name/Title STEVEN LUNDEEN PLANT ENGINEER
Phone and Ext. /FAX 320-587-1553
Email Address steven.lundeen@hti.htch.com
Address 40 W HIGHLAND PARK DRIVE HUTCHINSON MN 55350-9784

Waste Report Preparer Information

Name/Title STEVEN LUNDEEN CORPORATE ENVIRONMENTAL/SAFETY MGR.
Phone and Ext. /FAX 320-587-1553
Email Address steven.lundeen@hti.htch.com
Address 40 WEST HIGHLAND PARK DRIVE HUTCHINSON MN 55350-9784

Hazardous Waste Activity			
During 2013	Currently in 2014	Generator of Hazardous Waste	
X	X	Large Quantity Generator	Generate in any calendar month 1,000 kg (2,205 lbs) or more of hazardous waste; or Generate in any calendar month, or Accumulate at any time, more than 1 kg (2.2 lbs) of acute hazardous waste or more than 100 kg (220 lbs) of acute hazardous waste spill cleanup material.
		Small Quantity Generator	Generate in every calendar month less than 1,000 kg (2,205 lbs) of hazardous waste; and Accumulate at all times no more than 6,000 kg (13,320 lbs) of hazardous waste; and Generate in every calendar month, and Accumulate at all times, no more than 1 kg (2.2 lbs) of acute hazardous waste and no more than 100 kg (220 lbs) of acute hazardous waste spill cleanup material.
		Very Small Quantity Generator	Generate in every calendar month no more than 100 kg (220 lbs) of hazardous waste; and Accumulate at all times no more than 1,000 kg (2,205 lbs) of hazardous waste; and Generate in every calendar month, and Accumulate at all times, no more than 1 kg (2.2 lbs) of acute hazardous waste and no more than 100 kg (220 lbs) of acute hazardous waste spill cleanup material.
		Non generator	Generate no hazardous waste.
Yes X No	Yes X No	Treater, Storer, or Disposer of Hazardous Waste at your site AND a Receiver of Hazardous Waste from Off-site OR Treater, Storer or Disposer of Hazardous Waste at your site AND NOT a Receiver of Hazardous Waste from Off-site	
Yes X No	Yes X No	Publicly Owned (Wastewater) Treatment Works (POTW) that accepts hazardous waste (via truck, rail, or dedicated pipe) for treatment, and complies with s. NR 670.001(3)(b)9.	
Yes X No	Yes X No	Permanent Household and Very Small Quantity Generator Hazardous Waste Collection Facility that ships hazardous waste off-site to a licensed or permitted hazardous waste treatment, storage or disposal facility, or to a recycling facility	

Other Regulated Waste Activities Currently Involved In:

Hazardous Waste Activities	
1. Generator	
a. Short-Term Generator (generate from a short-term or one-time event and not from on-going process). if Yes, provide an explanation in the Comments section	----- No
b. United States Importer of Hazardous Waste	----- No
c. Mixed Waste (hazardous and radioactive) Generator	----- No
2. Transporter of Hazardous Waste	
a. Transporter	----- No
b. Transfer Facility (at your site)	----- No
3. Recycler of Hazardous Waste (at your site)	----- No
4. Exempt Boiler or Industrial Furnace	
a. Small Quantity On-Site Burner Exemption	----- No
b. Smelting, Melting, and Refining Furnace Exemption	----- No

Universal Waste Activities

1. Universal Waste Large Quantity Handler (accumulate 5,000 kg (11,025 lbs) or more at any time)

Universal Waste managed at your site (accumulate 5,000 kg (11,025 lbs) or more) ----- No

Managed

a. Batteries	-----	No
b. Pesticides	-----	No
c. Mercury Thermostats	-----	No
d. Fluorescent Lamps	-----	No
e. Antifreeze	-----	No
f. Other (specify)	-----	No

2. Universal Waste Destination Facility ----- No

Used Oil Activities:

1. Used Oil Transporter

a. Transporter	-----	No
b. Transfer Facility (at your site)	-----	No

2. Used Oil Processor or Re-Refiner

a. Processor	-----	No
b. Re-Refiner	-----	No

3. Off-Specification Used Oil Burner ----- No

4. Used Oil Fuel Marketer

a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner	-----	No
b. Marketer Who First Claims the Used Oil Meets the Specifications	-----	No

Eligible Academic Entities with Laboratories-Notification for opting into or withdrawing from managing laboratory hazardous wastes per 40 CFR Part 262 SubpartK (select all that apply)

1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories

a. College or University	-----	No
b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university	-----	No
c. Non-Profit Institute that is owned by or has a formal written affiliation agreement with a college or university	-----	No

2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories ----- No

Comments

Fee Worksheet (FW Form)

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A. Generator status during report year:

Large Quantity Generator

Base fee for generator status reported \$470.00

B. Amounts Generated and Tonnage Fee Exempted

1. Amount of waste generated (in lbs) 604,191

2. Please answer the following:

2a. Was the waste recovered for recycling or reuse (including hazardous waste burned for the purpose of energy recovery) ? Yes

Amount of waste recovered/recycled (in lbs) 162,722

2b. Was the waste leachate (which contained hazardous waste) transported to a wastewater treatment plant or discharged directly to a sewer ? (Note: Leachate is commonly generated by land disposal facilities) No

Amount of waste leachate transported to a WWTP (in lbs)

2c. Was the hazardous waste removed from the site to repair environmental pollution ? No

Amount of waste removed through environmental repair (in lbs)

2d. Was the hazardous waste collected by a municipality under a program for the collection and disposal of either household or agricultural hazardous waste ? No

Amount of waste collected under clean sweep (in lbs)

Net Waste (calculated from above) : 441,469

Tonnage Fee estimate (based on net waste) : \$4,414.69

Total Fee Estimate (Base Fee + Tonnage Fee): \$4,884.69

(Maximum Total Fee \$17,500)

This is only an estimate. Please do not pay this fee now.

Comments

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WASTE GENERATED IN 2013

Waste Code	Source Code	Form Code	Waste Description	Quantity UOM	Density UOM	Managed on-Site
F007	G03	W107	Waste Cyanide solution (Gold Bath containing cyanide, mostly water)	2,586 Pounds		N
WASTE MIN: No waste minimization efforts were implemented for this waste						
Receiving Site		Off-Site Management Method Code		Quantity Shipped		
EPA ID						
ILD005121439		H010 - Metals recovery including retorting, smelting, chemical, etc.		2,586		
Waste Code	Source Code	Form Code	Waste Description	Quantity UOM	Density UOM	Managed on-Site
D001	G09	W801	IPA/Acetone Wipes	5,544 Pounds		N
WASTE MIN: No waste minimization efforts were implemented for this waste						
Receiving Site		Off-Site Management Method Code		Quantity Shipped		
EPA ID						
KYD980573196		H020 - Solvents recovery (distillation, extraction, etc.)		5,544		
Waste Code	Source Code	Form Code	Waste Description	Quantity UOM	Density UOM	Managed on-Site
D001	G02	W219	Photoresist /Thinner (PGMEA)	2,822 Pounds		N
WASTE MIN: No waste minimization efforts were implemented for this waste						
Receiving Site		Off-Site Management Method Code		Quantity Shipped		
EPA ID						
KYD985073196		H061 - Fuel blending prior to energy recovery at another site (waste generated on-site or received from off-site)		2,822		
Waste Code	Source Code	Form Code	Waste Description	Quantity UOM	Density UOM	Managed on-Site
F006	G03	W310	Gold Rags/Filters (Filter Media, cyanide)	3,133 Pounds		N
WASTE MIN: No waste minimization efforts were implemented for this waste						
Receiving Site		Off-Site Management Method Code		Quantity Shipped		
EPA ID						
ILD005121439		H010 - Metals recovery including retorting, smelting, chemical, etc.		3,133		
Waste Code	Source Code	Form Code	Waste Description	Quantity UOM	Density UOM	Managed on-Site
F006	G03	W403	Resin Gold Reclaim	1,690 Pounds		N
WASTE MIN: No waste minimization efforts were implemented for this waste						
Receiving Site		Off-Site Management Method Code		Quantity Shipped		
EPA ID						
ILD005121439		H010 - Metals recovery including retorting, smelting, chemical, etc.		1,690		

Waste Code	Source Code	Form Code	Waste Description	Quantity UOM	Density UOM	Managed on-Site
D002	G03	W105	Nickel Strike Solution	61,231 Pounds		N
WASTE MIN: No waste minimization efforts were implemented for this waste						
Receiving Site EPA ID		Off-Site Management Method Code		Quantity Shipped		
IND000646943		H141 - Receiving site stored/bulked and transferred the waste with no treatment or recovery, fuel blending, or disposal		61,231		
Waste Code	Source Code	Form Code	Waste Description	Quantity UOM	Density UOM	Managed on-Site
D002	G03	W103	Copper Plating Bath Liquid	123,652 Pounds		N
WASTE MIN: No waste minimization efforts were implemented for this waste						
Receiving Site EPA ID		Off-Site Management Method Code		Quantity Shipped		
IND000646943		H141 - Receiving site stored/bulked and transferred the waste with no treatment or recovery, fuel blending, or disposal		123,652		
Waste Code	Source Code	Form Code	Waste Description	Quantity UOM	Density UOM	Managed on-Site
D002	G03	W310	Copper Plating Bath Filters	20,656 Pounds		N
WASTE MIN: No waste minimization efforts were implemented for this waste						
Receiving Site EPA ID		Off-Site Management Method Code		Quantity Shipped		
IND000646943		H141 - Receiving site stored/bulked and transferred the waste with no treatment or recovery, fuel blending, or disposal		20,656		
Waste Code	Source Code	Form Code	Waste Description	Quantity UOM	Density UOM	Managed on-Site
D002	G13	W310	Chrome Etching Solids	7,524 Pounds		N
WASTE MIN: No waste minimization efforts were implemented for this waste						
Receiving Site EPA ID		Off-Site Management Method Code		Quantity Shipped		
IND000646943		H141 - Receiving site stored/bulked and transferred the waste with no treatment or recovery, fuel blending, or disposal		7,524		
Waste Code	Source Code	Form Code	Waste Description	Quantity UOM	Density UOM	Managed on-Site
D002	G08	W110	Chrome Etching Liquids	87,056 Pounds		N
WASTE MIN: No waste minimization efforts were implemented for this waste						
Receiving Site EPA ID		Off-Site Management Method Code		Quantity Shipped		
IND000646943		H141 - Receiving site stored/bulked and transferred the waste with no treatment or recovery, fuel blending, or disposal		87,056		
Waste Code	Source Code	Form Code	Waste Description	Quantity UOM	Density UOM	Managed on-Site
D002	G13	W310	Metal Etch Sludge Filters	5,817 Pounds		N
WASTE MIN: No waste minimization efforts were implemented for this waste						
Receiving Site EPA ID		Off-Site Management Method Code		Quantity Shipped		
IND000646943		H141 - Receiving site stored/bulked and transferred the waste with no treatment or recovery, fuel blending, or disposal		5,817		
Waste Code	Source Code	Form Code	Waste Description	Quantity UOM	Density UOM	Managed on-Site
F006	G23	W501	Metal Hydroxide Filter Cake (Ferric)	268,208 Pounds		N
WASTE MIN: No waste minimization efforts were implemented for this waste						
Receiving Site EPA ID		Off-Site Management Method Code		Quantity Shipped		
ILD000666206		H010 - Metals recovery including retorting, smelting, chemical, etc.		154,882		
ILD000805812		H110 - Stabilization prior to land disposal at another site (encapsulation/stabilization/fixation)		113,326		

Waste Code	Source Code	Form Code	Waste Description	Quantity UOM	Density UOM	Managed on-Site
D002	G14	W519	Sodium Hydroxide, Sodium Metasilicate pit sludge	4,304 Pounds		N
WASTE MIN: No waste minimization efforts were implemented for this waste						
Receiving Site EPA ID		Off-Site Management Method Code		Quantity Shipped		
IND000646943		H132 - Landfill or surface impoundment that will be closed as landfill (to incl prior treatment and/or stabilization)		4,304		
Waste Code	Source Code	Form Code	Waste Description	Quantity UOM	Density UOM	Managed on-Site
D002	G04	W105	Ferric Chloride spilled material	5,654 Pounds		N
WASTE MIN: No waste minimization efforts were implemented for this waste						
Receiving Site EPA ID		Off-Site Management Method Code		Quantity Shipped		
ILD000666206		H141 - Receiving site stored/bulked and transferred the waste with no treatment or recovery, fuel blending, or disposal		5,654		
Waste Code	Source Code	Form Code	Waste Description	Quantity UOM	Density UOM	Managed on-Site
D002	G03	W103	Waste Sulfuric Acid	3,408 Pounds		N
WASTE MIN: No waste minimization efforts were implemented for this waste						
Receiving Site EPA ID		Off-Site Management Method Code		Quantity Shipped		
ILD000646943		H141 - Receiving site stored/bulked and transferred the waste with no treatment or recovery, fuel blending, or disposal		3,408		

ATTACHMENT D: Sample Training Record

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SELECT	<u>Name</u>	<u>Course Code</u>	<u>Start Date</u>	<u>Status Date</u>	<u>Status</u>
SELECT	LOCK-OUT/TAG-OUT (E-LEARNING)	HUSTLOTCBT	01/01/2015	01/19/2015	Mastered
SELECT	ELIMINATING SELF-DEFEATING BEHAVIORS FOR THOSE W/OUT DIRECT REPORTS (E-LEARNING)	HUBPESDCBT	01/01/2015	01/19/2015	Online In Progress
SELECT	AWAIR (E-LEARNING)	HUSTAWACBT	01/01/2015	01/19/2015	Mastered
SELECT	SUPPLEMENTAL CHLORINE TRAINING	ECSUPCHLTR	12/13/2014	12/13/2014	Finished
SELECT	HAZWOPER REFRESHER	HUSTHAZREF	12/09/2014	12/09/2014	Finished
SELECT	CONFINED SPACE ENTRY	HUSTCOSPET	12/09/2014	12/09/2014	Finished
SELECT	RIM TRAINING (E-LEARNING)	HURIMCBT	12/01/2014	12/02/2014	Mastered
SELECT	RIGHT TO KNOW (E-LEARNING)	HUSTRTKCBT	12/01/2014	12/02/2014	Mastered
SELECT	RESPIRATOR (FIT TEST AND TRAINING) RE-FIT	HUSTRESPIR	10/24/2014	10/27/2014	Finished
SELECT	LAB SAFETY ANNUAL TRAINING (CHEMICAL HYGIENE) (E-LEARNING)	HUSTLABCBT	10/01/2014	10/08/2014	Mastered
SELECT	CHEMICAL SAFETY AND HANDLING (E-LEARNING)	HUSTCSHCBT	10/01/2014	11/12/2014	Mastered
SELECT	RESPIRATOR (FIT TEST AND TRAINING)	HUSTRESPIR	09/19/2014	09/25/2014	Finished
SELECT	HAZARDOUS WASTE MANAGEMENT REFRESHER	HUHZWSTMG	09/17/2014	09/23/2014	Finished
SELECT	INTRODUCTION TO HTI'S QUALITY POLICY	HUHTQLTPLC	08/20/2014	09/02/2014	Finished
SELECT	RESPIRATOR PHYSICAL - 1 YEAR EXPIRATION	HUSTRESPPY	08/13/2014	12/10/2014	Finished
SELECT	RESPIRATOR PHYSICAL - 1 YEAR EXPIRATION	HUSTRESPPY	08/08/2014	09/02/2014	Finished
SELECT	POWERED INDUSTRIAL TRUCK CERTIFICATION/REFRESHER	HUSTPOINTF	02/14/2014	05/07/2014	Finished
SELECT	LOCK-OUT/TAG-OUT (E-LEARNING)	HUSTLOTCBT	02/01/2014	02/05/2014	Mastered
SELECT	AWAIR (E-LEARNING)	HUSTAWACBT	02/01/2014	02/05/2014	Mastered
SELECT	RIM TRAINING (E-LEARNING)	HURIMCBT	01/01/2014	01/02/2014	Mastered
SELECT	RIGHT TO KNOW (E-LEARNING)	HUSTRTKCBT	01/01/2014	01/02/2014	Mastered
SELECT	RESPIRATOR (FIT TEST AND TRAINING)	HUSTRESPIR	12/09/2013	01/29/2014	Finished
SELECT	HAZWOPER REFRESHER	HUSTHAZREF	12/09/2013	01/29/2014	Finished

<input type="checkbox"/> SELECT	CONFINED SPACE ENTRY	HUSTCOSPET	12/09/2013	01/29/2014	Finished
<input type="checkbox"/> SELECT	CHEMICAL SAFETY AND HANDLING (E-LEARNING)	HUSTCSHCBT	11/01/2013	11/05/2013	Mastered
<input type="checkbox"/> SELECT	LAB SAFETY ANNUAL TRAINING (CHEMICAL HYGIENE) (E-LEARNING)	HUSTLABCBT	11/01/2013	11/05/2013	Mastered
<input type="checkbox"/> SELECT	DOT HAZARDOUS MATERIALS	HUDOTMAT	10/30/2013	12/02/2013	Finished
<input type="checkbox"/> SELECT	DOT SHIPPING/EPA RCRA	HUSTHZM100	10/30/2013	12/02/2013	Finished
<input type="checkbox"/> SELECT	GLOBAL HARMONIZED SYSTEM - INITIAL TRANSITION TRAINING	HUSTGHSITR	10/09/2013	10/17/2013	Finished
<input type="checkbox"/> SELECT	AWAIR (E-LEARNING)	HUSTAWACBT	02/01/2013	02/19/2013	Mastered
<input type="checkbox"/> SELECT	RIGHT TO KNOW (E-LEARNING)	HUSTRTKCBT	02/01/2013	02/19/2013	Mastered
<input type="checkbox"/> SELECT	LOCK-OUT/TAG-OUT (E-LEARNING)	HUSTLOTCBT	02/01/2013	02/19/2013	Mastered
<input type="checkbox"/> SELECT	RIM TRAINING (E-LEARNING)	HURIMCBT	01/01/2013	01/30/2013	Mastered
<input type="checkbox"/> SELECT	DOT SHIPPING/EPA RCRA	HUSTHZM100	11/14/2012	11/19/2012	Finished
<input type="checkbox"/> SELECT	LAB SAFETY ANNUAL TRAINING (CHEMICAL HYGIENE) (E-LEARNING)	HUSTLABCBT	11/01/2012	11/05/2012	Mastered
<input type="checkbox"/> SELECT	CHEMICAL SAFETY AND HANDLING (E-LEARNING)	HUSTCSHCBT	11/01/2012	11/05/2012	Mastered
<input type="checkbox"/> SELECT	RESPIRATOR (FIT TEST AND TRAINING)	HUSTRESPIR	10/10/2012	11/05/2012	Finished
<input type="checkbox"/> SELECT	HAZWOPER REFRESHER	HUSTHAZREF	10/10/2012	11/05/2012	Finished
<input type="checkbox"/> SELECT	POWERED INDUSTRIAL TRUCK CERTIFICATION/REFRESHER	HUSTPOINTF	02/28/2012	02/29/2012	Finished
<input type="checkbox"/> SELECT	RIM TRAINING (E-LEARNING)	ECRIMCBT	02/01/2012	02/10/2012	Mastered
<input type="checkbox"/> SELECT	RIGHT TO KNOW (E-LEARNING)	ECSTRTKCBT	02/01/2012	02/10/2012	Mastered
<input type="checkbox"/> SELECT	LOCK-OUT/TAG-OUT (E-LEARNING)	ECSTLOTCBT	02/01/2012	02/10/2012	Mastered
<input type="checkbox"/> SELECT	AWAIR (E-LEARNING)	ECSTAWACBT	02/01/2012	02/10/2012	Mastered
<input type="checkbox"/> SELECT	HAZWOPER REFRESHER	HUSTHAZREF	11/01/2011	02/03/2012	Finished
<input type="checkbox"/> SELECT	RESPIRATOR PHYSICAL	HUSTRESPPY	11/01/2011	02/03/2012	Finished
<input type="checkbox"/> SELECT	RESPIRATOR (FIT TEST AND TRAINING)	HUSTRESPIR	11/01/2011	02/03/2012	Finished
<input type="checkbox"/> SELECT	CONFINED SPACE ENTRY	HUSTCOSPET	11/01/2011	02/03/2012	Finished
<input type="checkbox"/> SELECT	DOT SHIPPING/EPA RCRA	HUSTHZM100	08/24/2011	10/27/2011	Finished
<input type="checkbox"/> SELECT	CHLORINE EMERGENCY KIT B	HUSTCLBKIT	10/21/2010	10/27/2010	Finished
<input type="checkbox"/> SELECT	CONFINED SPACE ENTRY	HUSTCOSPET	10/21/2010	10/27/2010	Finished
<input type="checkbox"/> SELECT	RESPIRATOR (FIT TEST AND TRAINING)	HUSTRESPIR	10/21/2010	10/27/2010	Finished
<input type="checkbox"/> SELECT	HAZWOPER REFRESHER	HUSTHAZREF	10/21/2010	10/27/2010	Finished
<input type="checkbox"/> SELECT	2010 HAZARDOUS WASTE MANAGEMENT SEMINAR	SEMINAREXT	09/02/2010	10/25/2010	Finished

000000	RIM TRAINING (E-LEARNING)	ECRIMCBT	08/01/2010	08/11/2010	Mastered
000000	RIGHT TO KNOW (E-LEARNING)	ECSTRTKCBT	08/01/2010	08/11/2010	Mastered
000000	AWAIR (E-LEARNING)	ECSTAWACBT	08/01/2010	08/11/2010	Mastered
000000	LOCK-OUT/TAG-OUT (E-LEARNING)	ECSTLOTCBT	08/01/2010	08/11/2010	Mastered
000000	LAB SAFETY ANNUAL TRAINING (CHEMICAL HYGIENE) (E-LEARNING)	ECSTLABCBT	01/01/2010	01/20/2010	Mastered
000000	INTERNAL CONTROLS (E-LEARNING)	ECBPINTCBT	01/01/2010	01/21/2010	Mastered
000000	DOT SHIPPING/EPA RCRA	HUSTHBM100	11/17/2009	11/25/2009	Finished
000000	RIGHT TO KNOW (E-LEARNING)	ECSTRTKCBT	09/01/2009	09/30/2009	Mastered
000000	AWAIR (E-LEARNING)	ECSTAWACBT	09/01/2009	09/22/2009	Mastered
000000	LOCK-OUT/TAG-OUT (E-LEARNING)	ECSTLOTCBT	09/01/2009	09/22/2009	Mastered
000000	HAZWOPER TECHNICIAN CERTIFICATION	HUSTHAZWOP	08/19/2009	08/31/2009	Finished
000000	DOT SHIPPING/EPA RCRA	HUSTHBM100	12/02/2008	11/25/2009	Finished
000000	RESPIRATOR (FIT TEST AND TRAINING)	HUSTRESPIR	11/18/2008	12/03/2008	Finished
000000	PIT CERTIFICATION/REFRESHER	HUSTPOINTF	10/28/2008	11/05/2008	Finished
000000	RESPIRATOR PHYSICAL - 1 YEAR EXPIRATION	HUSTRESPPY	10/17/2008	10/20/2008	Finished
000000	RIVIERA BENDS REFRESHER	ECOPRECERT	09/08/2008	09/25/2008	Finished
000000	ERP MO AND WORK ORDER REPORTING (E-LEARNING)	ECERPPBW03	09/01/2008	09/29/2008	Mastered
000000	ERP GEN MOVEX OVERVIEW & NAVIGATION (E-LEARNING)	ECERPGNCBT	09/01/2008	09/29/2008	Mastered
000000	RTK/HAZ COM (ANNUAL)	HUSTRTKHAZ	08/20/2008	08/28/2008	Finished
000000	AWAIR	HUSTAWAIR	08/20/2008	08/28/2008	Finished
000000	LOTO (ANNUAL AFFECTED)	HUSTLOTO	08/20/2008	08/28/2008	Finished
000000	BAY GENERALS RECERTIFICATION	ECOPRECERT	06/26/2008	07/09/2008	Finished
000000	RIVIERA BENDS REFRESHER	ECOPRECERT	06/20/2008	07/08/2008	Finished
000000	PHOTO ETCH OPERATOR EXPOSE	ECPEEXP102	05/09/2008	09/25/2008	Finished
000000	PHOTOETCH CLEANLINE/ROLLERCOATER	ECPEEXP103	05/09/2008	09/25/2008	Finished
000000	DES MATERIAL HANDLING	ECPEMTLHND	04/25/2008	05/20/2008	Finished
000000	EDVS/SHEAR/MEASUREMENT MATERIAL HANDLING	ECPEMTLHND	04/25/2008	05/20/2008	Finished
000000	CCE MATERIAL HANDLING	ECPEMTLHND	04/25/2008	05/20/2008	Finished
000000	CHEMICAL SAFETY AND HANDLING (CLASSROOM AND TOUR)	HUSTCSHCLS	03/06/2008	03/11/2008	Finished
000000	PHOTO ETCH MULTI-PACK REFRESHER	ECOPRECERT	02/29/2008	04/29/2008	Finished

RTK/HAZ COM (ANNUAL)	HUSTRTKHAZ	12/08/2007	12/10/2007	Finished
AWAIR	HUSTAWAIR	12/08/2007	12/10/2007	Finished
LOTO (ANNUAL AFFECTED)	HUSTLOTO	12/08/2007	12/10/2007	Finished
PROBLEM IDENTIFICATION (E-LEARNING)	HUCBPIDCBT	03/26/2007	03/27/2007	Finished
WORKING EFFICIENTLY (E-LEARNING)	HUCBWEFCBT	03/26/2007	03/27/2007	Finished
BAY GENERALS RECERTIFICATION	ECOPRECERT	11/13/2006	11/14/2006	Finished
NON-CONFORMING PRODUCT CONTROL RECERTIFICATION	ECPSRECERT	09/21/2006	10/05/2006	Finished
LOTO (ANNUAL AFFECTED)	HUSTLOTO	09/03/2006	09/07/2006	Finished
AWAIR	HUSTAWAIR	09/03/2006	09/07/2006	Finished
RTK/HAZ COM (ANNUAL)	HUSTRTKHAZ	09/03/2006	09/07/2006	Finished
DEVELOP ETCH/STRIP	ECPSRECERT	08/21/2006	09/22/2006	Finished
PHOTO ETCH OPERATOR BAY GENERALS	ECPEOPBGEN	08/09/2006	08/17/2006	Finished
PHOTOETCH PS DEVELOP/ETCH/STRIP	ECPEDES201	08/09/2006	08/16/2006	Finished
QUALITY CONCEPTS FOR MANUFACTURING (E-LEARNING)	ECCBQCMCBT	08/01/2006	08/02/2006	Finished
HTI PRODUCTS AND PROCESSES (E-LEARNING)	ECCBPP CBT	07/31/2006	08/01/2006	Finished
INTELLECTUAL PROPERTY (E-LEARNING)	HUBPIT CBT	07/18/2006	08/02/2006	Finished
PHOTO ETCH OPERATOR DUAL FEED EDVS	ECPEEDV101	07/18/2006	07/27/2006	Finished
PHOTO ETCH OPERATOR RMMS	ECPEOPRMMS	07/18/2006	07/27/2006	Finished
PHOTO ETCH OPERATOR INFINEX/SSPIE	ECPEOPINSS	07/18/2006	07/27/2006	Finished
PHOTO ETCH OPERATOR SUMMIT	ECPEOPSUMM	07/18/2006	07/27/2006	Finished
PHOTOETCH OPERATOR DUAL DEVELOPED IMAGE MEASURING SYSTEM	ECPEOPDIMS	07/18/2006	05/07/2008	Finished
PHOTO ETCH OPERATOR DEVELOP	ECPEDEV101	07/18/2006	07/27/2006	Finished
PHOTO ETCH OPERATOR STRIP	ECPESTR101	01/30/2006	03/23/2006	Finished
PHOTO ETCH OPERATOR SHEET TO STRIP SHEAR	ECPEINS102	01/17/2006	03/23/2006	Finished
PHOTO ETCH OPERATOR ETCH	ECPEETC101	01/16/2006	03/23/2006	Finished
TRACE INSPECTION - INSPECT ORDER	ECTRINS101	12/24/2005	01/05/2006	Finished
INTRO TO COMPUTERS	HUCSITC100	12/20/2005	01/05/2006	Finished
TRACE VISUAL CBT	ECTRVIS200	12/20/2005	01/05/2006	Finished
INSPECTION BOO TRAINING	HUBOOINSP	12/20/2005	01/05/2006	Finished

	CONTAMINATION AWARENESS 101 (E-LEARNING)	HUCONTCBT	12/20/2005	01/05/2006	Finished
	RTK/HAZ COM (ANNUAL)	HUSTRTKHAZ	12/19/2005	01/09/2006	Finished
	LOTO	HUSTLOTO	12/19/2005	01/09/2006	Finished
	LASER SAFETY VIDEO (E-LEARNING)	HUSTLASER	12/19/2005	01/09/2006	Finished
	AWAIR (E-LEARNING)	HUSTAWACBT	12/19/2005	01/09/2006	Finished
	SECURITY (AWARENESS)	HUSTSECRITY	12/19/2005	01/09/2006	Finished

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ATTACHMENT E: Off-Site Facility Plan

Off-Site Facility Plan For
Hutchinson Technology Inc.
2435 Alpine Road
Eau Claire WI 54703

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Off-Site Facility Plan For
Hutchinson Technology Inc.
2435 Alpine Road
Eau Claire, WI 54703
715-838-7713
SERB ID #015012-8

Contact Information:

Facility Coordinator

Bernard Stolarz
Environmental & Safety Engineer
715-838-7780 ext 4338 (work)
715-874-4487 (Home) (24-hr)
541-556-5912 (Cell) (24-hr)

Alternate Coordinator

Chris Maurina
Safety Supervisor
715-838-9800 ext 7082 (work)
715-838-9636 (Home) (24-hr)
715-579-3398 (Cell) (24-hr)

Second Alternate Coordinator

Korey Klammer
Safety Coordinator
715-838-9800 ext 7050 (work)
715-552-1887 (Home) (24-hr)
715-579-4605 (Cell) (24-hr)

Chemicals On Site (Extremely Hazardous Substances):

<u>CAS No.</u>	<u>Chemical/Trade Name</u>	<u>Max. Amt.</u>	<u>Vulnerability Zone</u>	<u>Open/Urban</u>
7664-93-9	Sulfuric Acid (40% - 98%)	73,000 lbs	150 ft. (worst case)	Open
			50 Ft (realistic)	Open
7782-50-5	Chlorine (100% solution)	16,000 lbs	5 mile (worst case)	Open
			0.3 mile (realistic)	Open

Vulnerability Zones were determined by using the Wireless Information System for Emergency Responders (WISER) program. Release amounts and emission rates into the atmosphere were statistically modeled based on (1) data from the U.S. DOT HMIS database; (2) container types and sizes authorized for transport as specified in 49 CFR §172.101 and Part 173; (3) physical properties of the materials involved, and (4) atmospheric data from a historical database. The emission model calculated the release of vapor due to evaporation of pools on the ground, direct release of vapors from the container, or a combination of both, as would occur for liquefied gases which can flash to form a vapor/ aerosol mixture and an evaporating pool. In addition, the emission model also calculated the emission of toxic vapor by-products generated

from spilling water-reactive chemicals in water. Spills that involve releases of approximately 200 liters or less are considered Small Spills, while spills that involve quantities greater than 200 liters are considered Large Spills.

NOTE: The vulnerability zones are NOT intended to be used as a guide for population protection in fire-related incidents. Fire incidents were considered in the development of this plan and the plan provides basic information about the facility for first responders to employ.

However, in an actual fire situation at this facility, the Incident Commander is strongly recommended to reference the fire department's own individual agency pre-emergency plans and standard operating procedures as well as the County's Emergency Operations Plan - Annex K: Fire and Rescue, as they may relate to this facility when making decisions at an incident involving fire. Further, fire departments that would respond to an incident at this facility are strongly encouraged to meet with facility representatives to determine ways to minimize an event at the facility and to determine what additional information and factors should be taken into consideration in the event of a fire.

The field incident commander shall determine the actual response to an incident and the affected area may vary from the planning vulnerability zone identified in this Plan. Depending on wind speed and direction, the amount of material released and other pertinent factors, the ACTUAL vulnerability zone may be smaller, and in some instances larger, than the credible worst case vulnerability zone identified herein.

The vulnerability zones determined in this Plan are for general PLANNING PURPOSES.

Chemicals On Site (not all are included): Combine this with chemistries listed on page 6.

7727-37-9	Nitrogen, Cryogenic Liquid	75,000 lbs
74-98-6	Propane	275,000 lbs
7647-01-0	Hydrochloric Acid	77,000 lbs
141-43-5	Monoethanolamine	17,400 lbs
1310-73-2	Sodium Hydroxide	99,000 lbs
7782-44-7	Oxygen, Cryogenic Liquid	28,500 lbs
7440-37-1	Argon, Cryogenic Liquid	10,500 lbs
7783-54-2	Nitrogen Trifluoride, Compressed Gas	500 lbs
7447-39-4	Cupric Chloride	48,000 lbs
7705-08-0	Ferric Chloride	175,000 lbs
7782-41-4	Fluorine compressed gas (5%)	86 lbs
7722-84-1	Hydrogen Peroxide (50%)	
1305-62-0	Calcium Hydroxide (slaked lime)	12,000lbs
7699-73-72	Nitric Acid	600 lbs

Primary Emergency Responders:

City of Eau Claire Police Department PO Box 496 (740 Second Avenue) Eau Claire, WI 54702-0496 911 direct or (715) 839-4975	City of Eau Claire Fire Department #2 Fire Station, 216 S. Dewey St. (Second Floor) Eau Claire, WI 54703- 0496 911 direct or (715) 839-5012
The West Central Regional Response Team #2 Fire Station, 216 S. Dewey St. (Second Floor) Eau Claire, WI 54703- 0496 911 direct or (715) 839-5012	Bay West Emergency Response (Contractor) Bay West Incorporated, 5 Empire Drive St. Paul, MN 55103-1867 (800) 279 - 0456 (612) 291 - 0456

Support Available At/From Facility (24/7 coverage):

45 member Hazwoper certified team on site. (Distributed throughout 4 crews)

56 member EMS team on site with CPR/AED/First aid certification, where 14 of the 58 are state certified First Responders. (Distributed throughout 4 crews)

Chemical Emergency Monitoring Equipment:

See Hazard Analysis Section of this plan

Personal Protective Equipment (On Site):

Neoprene Rubber Gloves = 45 pair

Chem resistant sleeves = 12 pair

Face shields = 22

Eye Goggles = 15

Neoprene Rubber Apron/Cloak = 19

Chemical Resistant Rubber Boots = 4 pair

Air Purifying Respirators (full face)= 26

½ hour Scott Air Pack Self Contained Breathing Apparatus (SCBA) = 6 plus each with a spare ½ hour tank

1 hour Scott Air Pack Self Contained Breathing Apparatus (SCBA) = 2 plus each with a spare 1 hour tank.

Tyvek full body suits with hood = 25

Fall Protection Harnesses = 4

Level B Suits=4

Chemical Resistant Boot Covers=20 pair

Equipment/Supplies & Resources (On Site):

- 1 Gaylord Spill Kit
- 2 Barrel over Pack containers.
- Trench Containment system
- 2 On site Water Treatment facilities.
- Spectralink phone system for internal communication
- On Site Internal Alarm System
- Portable Sperrian Cl2 monitors
- Portable MSA Multi gas monitor.
- Designated central command room. (EMS Brigade room)

Hazards Analysis:**Description of Business**

Hutchinson Technology manufactures Computer Suspension Assemblies at it Eau Claire Facility. At this facility there are four main manufacturing processes distributed throughout four main buildings allowing the site to be fully integrated..

First is an Assembly operation (building 1) which commenced manufacturing in December of 1995. This area mainly uses pneumatic and electrical equipment to manufacture and package final product.

The second process areas are Photo Etch and Trace component operations (buildings 2 & 3), which began to manufacture in September 1997 and 1999 respectively. The Photo Etch and Trace component areas use mainly wet processes to develop etch and strip raw materials creating components for final assembly. At this time the Trace component areas have been shutdown due to the addition of a newer process called TSA+

The last process area is known as TSA+ (building 4) and was constructed in 2006. The TSA+ process uses similar wet process technology as the Trace process, but utilizes a web based process making the trace process obsolete.

Description of Bulk Chemical Handling

A variety of electro-mechanical and chemical processes are performed on site, with a majority of the bulk chemical handling and distribution occurring on the Component and TSA+ areas of the site. However, chemical use and processes may be found in any of the manufacturing areas

Hutchinson Technology receives chemicals in various sizes, from <1 gallon containers to 55 gallon drums, 330 gallon totes, to several thousand gallon tanks filled by tanker trucks.

A partial list of the bulk chemical used on site are listed below:

Sulfuric Acid	H ₂ SO ₄
Sodium Hydroxide	NaOH
Hydrochloric Acid	HCl
Liquid Chlorine	Cl ₂
Ferric Chloride	FeCl ₃
Nitrogen Trifluoride	NF ₃
Liquid Nitrogen	N ₂
Liquid Oxygen	O ₂
Liquid Argon	Ar
Monoethanolamine	NH ₂ CH ₂ CH ₂ OH
1-METHYL-2-PYRROLIDINONE,	NMP
Isopropyl Alcohol	IPA
Acetone	C ₃ H ₆ O.

Some bulk chemicals are transported into the facility's lower level to a chemical bulk storage room (Room number B05) from a tanker truck unload station located at the northeast side of the building structure. The chemicals are pumped in through dedicated pipelines located in an underground tunnel specifically for this purpose. Sulfuric acid, Sodium hydroxide, Hydrochloric Acid, and Ferric Chloride are delivered in this manner.

Up to 3,000 gallons of Sulfuric Acid (an EHS) is brought into storage through this unloading system. This amount includes any chemical left in the transport line. This would be equal to approximately 45,900 lbs as a 40% solution.

One exception is bulk liquid chlorine; which is stored in one ton cylinders in concrete bunkers near the chemical unload station on the northeast side of the building. A concrete shed housing a chlorine evaporator and a scrubber capable of scrubbing one ton of chlorine is located adjacent to the storage bunkers. From this point, chlorine gas is transported by pipe through the tunnel and into the lower level of the facility to the process where it is used.

Room B05 (Bulk Chemical Storage) has 2 - 5000 gallon tanks for Sulfuric Acid (40%), two 5000 gallon tanks for Sodium Hydroxide (50%), two 5000 gallon tanks for Hydrochloric Acid, four 5000 tanks for Ferric Chloride, and four 5000 gallon tanks for waste Ferric Chloride.

From Room B05, (Bulk Chemical Storage) several concentrated chemicals (Cl₂, HCl, NaOH, FeCl₃, H₂SO₄) are distributed to the process through a distribution system incorporating overhead piping to the primary point of use in rooms B08, B13, B20, & B40. (Manufacturing areas) Once distributed to these areas, concentrated chemicals are mixed to process dependent

concentrations (usually much less than the storage strength).

From these areas, chemicals are distributed to various processes on the 1st floor in Blg #2, 3, & 4. After use, the rinse waters and spent chemical baths are drained through drain piping which transfers the chemicals to either a wastewater pretreatment system located in room B08 (north of B13 and south of B05), and the north end of B28 or to special containment areas located in the basement under the process.

Sulfuric Acid (H₂SO₄) and Sodium Hydroxide (NaOH) are used in the wastewater pretreatment systems for pH adjustment. They are piped overhead as described earlier in this section to the point of use in B08. (Approximately 65 gallons of sulfuric acid are held in pipelines between the truck unload area and the storage tank. Approximately 50 gallons are held in the distribution piping in the basement. These quantities are figured in the overall tank capacity of 3,000 lbs. as stated in an earlier reference in this section of the plan. Sulfuric Acid is also transported by 55 gallon portable carboys for use in a similar process in room 17.

All floor drains on the manufacturing level of the Component facility and the lower level are contained in a "special waste" tank in a pit located in B08. Any spill anywhere in the building will be contained and pumped to the appropriate process for pretreatment.

Nitrogen Trifluoride (NF₃) is handled in a 1 ton compressed gas cylinder. The gas is distributed from this location through piping to the manufacturing process in room 118 & 168.

* NOTE: Currently, the NF₃ system is out of service due to the Trace process being obsolete. The 1 ton cylinder will be kept on site for possible process testing for future endeavors. It will be held outside in a locked cage area near room 117B. The gas distribution system has been completely purged of all NF₃, and the main power has been disconnected.

Fume Scrubbers

The HF fume scrubber is located on the east wall in B09 and the central area of B20. These systems are designed to scrub Hydrofluoric Acid from the plasma etching exhaust system (HF is a byproduct of the etching process). This system is a neutralization system utilizing Sodium Hydroxide. In addition to the scrubbers, oil separator tanks are located next to the scrubbers for vacuum pump oil recovery. These tanks contain water and oil, which are contaminated with hydrofluoric acid.

NOTE: At this time, the Fume Scrubbers have been disconnected and placed out of service due to the NF₃ system being shutdown.

Chemical Storage

Along with the storage of bulk chemistries, Hutchinson Technology also has three main storage areas where smaller containers of chemicals are stored.

First is the bulk Chemical Storage area (B05) where 55 gallon drums (along with bulk chemistries) are stored. Pallet racking is utilized for storage and segregation of various chemical drums, containers, and totes, including a maximum of 25 – 55 gallon drums of Sulfuric Acid (50%- 98%). This room is highly monitored for leaks and spills, and is equipped with an in ground trench system for containment in the event a leak or spill were to occur. Also the room is equipped with fans capable of pulling 6000 CFM's out of the room in the event of chemical gas release.

Second is a flammable storage area (F117) where all flammable chemicals are stored, including some flammable waste. The room in where these chemicals are stored is monitored by an internal Simplex fire monitoring system and is protected by an AFFF (Aqueous Film Forming Foam) system. In the event that a fire were to occur, the room was also manufactured with a blow out wall located on the west side of the room.

A third area is a flammable storage area (B30) where additional flammable waste is stored. This room also is monitored by an internal Simplex fire monitoring system and is protected by an AFFF (Aqueous Film Forming Foam) system. In the event that a fire were to occur, the room was also manufactured with a blow out wall located on the north side of the room.

Monitors and Alarms. There are two alarm set points (warning and evacuation) for the gases monitored.

Because of the use of potentially hazardous gases, the facility is equipped with sensors and alarms to warn of a gas release. The four chemicals monitored continuously are Nitrogen Trifluoride (NF₃), Hydrofluoric acid (HF), and Chlorine (CL₂), Hydrochloric Acid, (HCl), and Fluorine (F₂). In all cases, the systems are set to go into a "maintenance" alarm state at a level one-half of the OSHA eight hour time weighted average PEL. In the event the level reaches the eight hour TWA limit, an "evacuation" alarm is sounded, and the personnel leave the area until the situation is rectified.

These "evacuations" are handled by internal emergency brigade responders and trained Hazmat personnel.

NOTE: At this time the NF₃ is not being monitored due to the NF₃ system being shut down.

Miscellaneous

In addition to the chemicals stored, distributed and used as described above, Hutchinson Technology employs a gold electro plating process. This process uses gold potassium cyanide $K(Au)CN$ salts as the gold source. While every safety precaution has been observed in the design and operation of the process, the potential exists for a release of hydrogen cyanide (HCN) gas. This situation is very unlikely, and would only happen if a series of several accidents occurred and safety devices were overridden simultaneously within the process.

Emergency Contact Inside Facility

Building Coordinator telephone number 715-830-7088

Production Maintenance lead 715-830-4455

EMS room main line – 715-830-7745

Chemical Release Scenarios

Due to the nature of the containment designed into and constructed in the facility, the most likely release scenarios will occur at the truck unload station and chlorine storage/evaporator area northeast of the building. The scenarios are described below:

Sulfuric Acid - Under actual conditions a tanker with sulfuric acid carries a smaller payload due to DOT weight restrictions and the high density of the acid. Therefore, for modeling purposes, the worst case release is 2,000 gallons (Approximately 30,600 pounds of sulfuric acid as a 40% solution or 29,988 pounds of pure Sulfuric Acid) from a tank truck in a pool covering an 800 square foot area.

Scenario criteria are:

Neutral Air Stability

Night time

Open Country

3.4 mph wind

1/10 IDLH (Immediately Dangerous to Life and Health) concentration

Rapid release of maximum quantity of chemical (10 min.)

Diked area=800 Square Feet

The evacuation radius, as calculated by Wiser for a large spill of over 200 liters or 52.834 gallons of a Sulfuric Acid release, is determined to be **150 ft**. The Vulnerability Zone primarily affects employees in the plant.

The more realistic scenario, involving the same conditions, is calculated using the following criteria:

- Neutral Air Stability
- Day Time
- Open Country
- 3.4 mph wind
- 1/10 IDLH (Immediately Dangerous to Life and Health) concentration
- Rapid release of maximum quantity of chemical (10 min.)
- Diked area=800 Square Feet

The evacuation radius, as calculated by the WISER software package for a 29,988 lb. release, is determined to be 50 ft. . The Vulnerability Zone primarily affects only employees in the plant.

Chlorine – this chemical is shipped and stored in one ton cylinders. The storage area consists of two covered concrete bunkers, each with four one-ton cylinders, located in the vicinity of the tanker unload area. One cylinder is placed in service at any given time. The safety features for this system include the capability to scrub one ton of chlorine from the contained incident in the closed bunker system. The most likely release scenario would be a release of one ton (2000 pounds) of chlorine from a cylinder damaged during handling outside the bunker, or in the case of mechanical malfunction of the bunker cover at the time of a leak in the bunker.

Scenario criteria are:

- Neutral Air Stability
- Open Country
- 3.4 mph wind
- 1/10 IDLH (Immediately Dangerous to Life and Health) concentration
- Rapid release of maximum quantity of chemical (10 min)

The evacuation radius, as calculated by Wiser software indicates for a large spill over 200 L or 52.834 gallons to be More than 5 miles. The vulnerability Zone affects the population within a 5 mile radius. The population is estimated to be 15,000 people.

The more realistic scenario involving, the same conditions is calculated using the following criteria:

- Neutral Air Stability
- Day Time
- Open Country
- 3.4 mph wind

1/10 IDLH (Immediately Dangerous to Life and Health) concentration
 Rapid release of maximum quantity of chemical (10 min)

The evacuation radius is calculated by WISER software and is determined to be 0.3 miles.
 The Vulnerability Zone affects the population within a 0.3 mile radius. The population is estimated to be 3,000 people.

Special Facilities Affected: Color coded affected establishments (WISER versus EPA model)

AFFINITY HOUSE (State AODA Treatment Facility) 3042 Kilbourne Ave Eau Claire WI 54703 Potential evacuees: 18 Contact: 833-0436	BRIGHT BEGINNINGS EARLY LEARNING 1612 Truax Blvd Eau Claire, WI 54703 Potential evacuees: 198 Contact: 831-9944
BETHEL CHRISTIAN SCHOOL 2361 N. Hastings Way Eau Claire, WI 54703 Potential evacuees: 100 Contact: 835-8866	CHIPPEWA VALLEY TECHNICAL COLLEGE West Campus 600 W Clairemont Ave Eau Claire, WI 54701 Potential evacuees: 3,492 Contact 833-6200
CHIPPEWA VALLEY TECHNICAL COLLEGE Gateway Campus 620 West Clairemont Ave Eau Claire, WI 54701 Contact: 874-4603	COLOR MY WORLD NORTH 1903 Western Avenue Eau Claire, WI 54703 Potential evacuees: 85 Contact: 835-2060 or 839-0592
CVTC CHILD DEVELOPMENT CENTER 609 W Clairemont Ave Eau Claire, WI 54701 Potential evacuees: 52 Contact: 833-6231	DELONG MIDDLE SCHOOL 2000 Vine Street Eau Claire, WI 54703 Potential evacuees: 1220 Contact: 839-5140 or 835-7477
DOVE HEALTH CARE 1405 Truax Blvd. Eau Claire, WI 54703 Potential evacuees: 180 Contact: 552-1030 or 926-4351	EAU CLAIRE LUTHERAN SCHOOL 3031 Epiphany Eau Claire, WI 54703 Potential evacuees: 130 Contact: 835-9155
HAND IN HAND 800 Wisconsin St. Eau Claire, WI 54703 Potential evacuees: 144 Contact: 833-7744	LINCOLN SCHOOL 400 Cameron Street Eau Claire, WI 54703 Potential evacuees: 390 Contact: 839-2816

HOPE LUTHERAN PRESCHOOL 2226 Eddy Lane Eau Claire, WI 54703 Potential evacuees: 50 Contact: 832-1414	LAKE SHORE ELEMENTARY & SACC 711 Lake St Eau Claire, WI 54703 Potential evacuees: 324 Contact: 839-5166
LUTHER HOSPITAL 1221 Whipple Street Eau Claire, WI 54701 Potential evacuees: 310 Contact: 839-3311	LUTHER MIDDLEFORT CHILD DEVELOPMENT CENTER 540 Fulton St. Eau Claire, WI 54703 Potential evacuees: 200 Contact
NORTH HIGH SCHOOL 2700 Mercury Avenue Eau Claire, WI 54703 Potential evacuees: 1125 Contact: 839-6227	MT. WASHINGTON RESIDENCE 1930 Cleveland Street Eau Claire, WI 54703 Potential evacuees: 100 Contact: 834-3400
REACH INC. 2125 Third Street Eau Claire, WI 54703 Potential evacuees: 120 Contact: 833- 7755 or 835-1457	NORTHSTAR MIDDLE SCHOOL 2711 Abbey Hill Drive Eau Claire, WI 54703 Potential evacuees: 700 Contact: 839-6181
SACRED HEART HOSPITAL 900 W. Clairemont Avenue Eau Claire, WI 54701 Potential evacuees: 607 Contact: 839-4121	ROOSEVELT SCHOOL 3010 Eighth Street Eau Claire, WI 54703 Potential evacuees: 290 Contact: 852-4710
SHERMAN SCHOOL 3110 West Vine Street Eau Claire, WI 54703 Potential evacuees: 350 Contact 852-4810	SHEPHERD'S FOLD DAY CARE 3031 Epiphany Lane Eau Claire, WI 54703 Potential evacuees: 55 Contact 835-9207
WESTERN DAIRYLAND HEAD START 623 Truax Blvd Eau Claire, WI 54703 Potential evacuees: 39 Contact: 834-4498	ST. JAMES SCHOOL-EAU CLAIRE 2502 N. 11th Street Eau Claire, WI 54703 Potential evacuees: 125 Contact: 830-2277

Population Protection:

Internally

Eau Claire County

Although extremely rare, a chemical release that affects significant amounts of people may be possible. During an event such as this, HTI has two internal teams to help control situations as they arise within the facility.

The first group is a certified Hazwoper (Hazmat) team. This team is made up of Facilities, Chemical Services, and Maintenance personnel from within the site. The main responsibility of this group is to determine the hazard involved, isolate "hot" zones, contain the spill or leak, and correct any and all issues that arise.

The second group is an EMS team which helps to isolate "hot" zones within the facility and to help in the evacuation process if necessary. The EMS team may also assist the internal Hazmat team by monitoring team members as they enter "hot" zones, and assist in any other medical related injuries.

In the most realistic of scenarios, most incidents will occur internally and can be maintained by the onsite Hazwoper team. In the event that a large release were to occur, the team is instructed to contact the local authorities listed under the Primary Emergency Responders Section of this report for large scale support.

Externally

As stated above, a chemical release that affects significant amounts of the general public is considered to be rare. Although rare the possibility of a chemical release is possible. In the event of a large release the HTI internal Hazmat team has explicit instructions to contact the local authorities immediately with the following information.

- Name of Company
- Incident Commander name and title
- Name of chemical(s) involved and an estimated quantity that is or has been released to the environment.
- What steps that have already been done to contain the spill
 - Whether the spill has been contained or not.
 - What internal steps have been done to fix the issue?
 - Why external help is needed.

The HTI facility is equipped to handle most chemical releases, and the main responsibility of external resources will be to help isolate and evacuate the general public if needed.

If any HTI chemistry triggers a federally reportable release, the National Response Center will also be notified.

HTI also has contracted with Bay West Environmental and Industrial Solutions Company out of St. Paul Minnesota to help with environmental consulting purposes, and with chemical remediation if needed. Bay West is a 24 Emergency Response team that responds to hundreds of emergency spill responses each year. They help with the recover and clean up of hazardous materials, petroleum, and chemical/corrosive substances on land and water, as well as containers/drums

In-Place Sheltering

The lead time for a hazardous materials incident may be very short and, there may not be time enough for a safe and thorough evacuation. An evacuation under these circumstances may expose the community to dangerous chemicals as they leave the facility, and the decision to shelter in place may be made. The determination to shelter in place or to evacuate will be made by the on-scene incident commander.

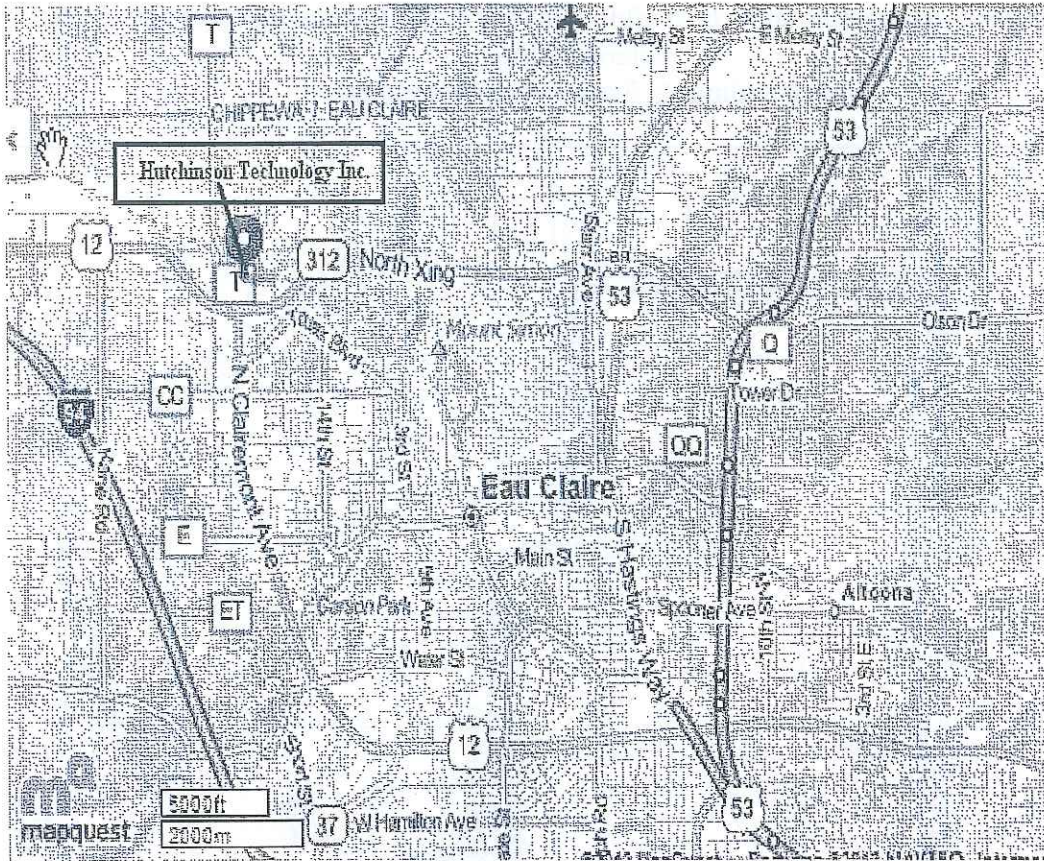
Preferred areas for protective sheltering would be interior hallways, rooms without windows or exterior doors, enclosed stairways and rooms on the side of the building away from the approaching hazard. Doors, windows, and other potential air leaks should be sealed up to prevent toxic fumes from entering.

Evacuation

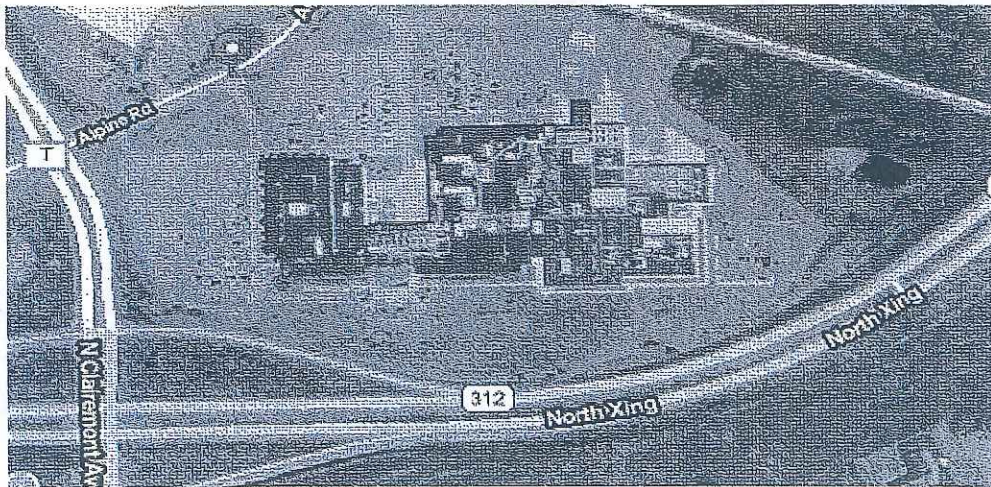
Experience indicates that shelter space would need to be provided for only 30% of the population within the initial isolation and evacuation zones and the remaining 70% would seek shelter with family and friends outside of the risk zone. All public schools listed under Special Facilities are eligible evacuation shelters, if not downwind of the actual release.

Special Considerations:

Hutchinson Technology Inc. is located near the intersection of Clairemont Avenue (County RD T) and the North Crossing (Highway 312). These are well traveled roads and would need to be considered if a release occurred. Along with the road system there is a train line running just north of the property. There is no local ordinances in Eau Claire County which mandate specific routes for vehicles carrying Extremely Hazardous Substances (EHS_s). Thus, EHS_s may be transported over any local, state, or federal highway for which weight limits are met.

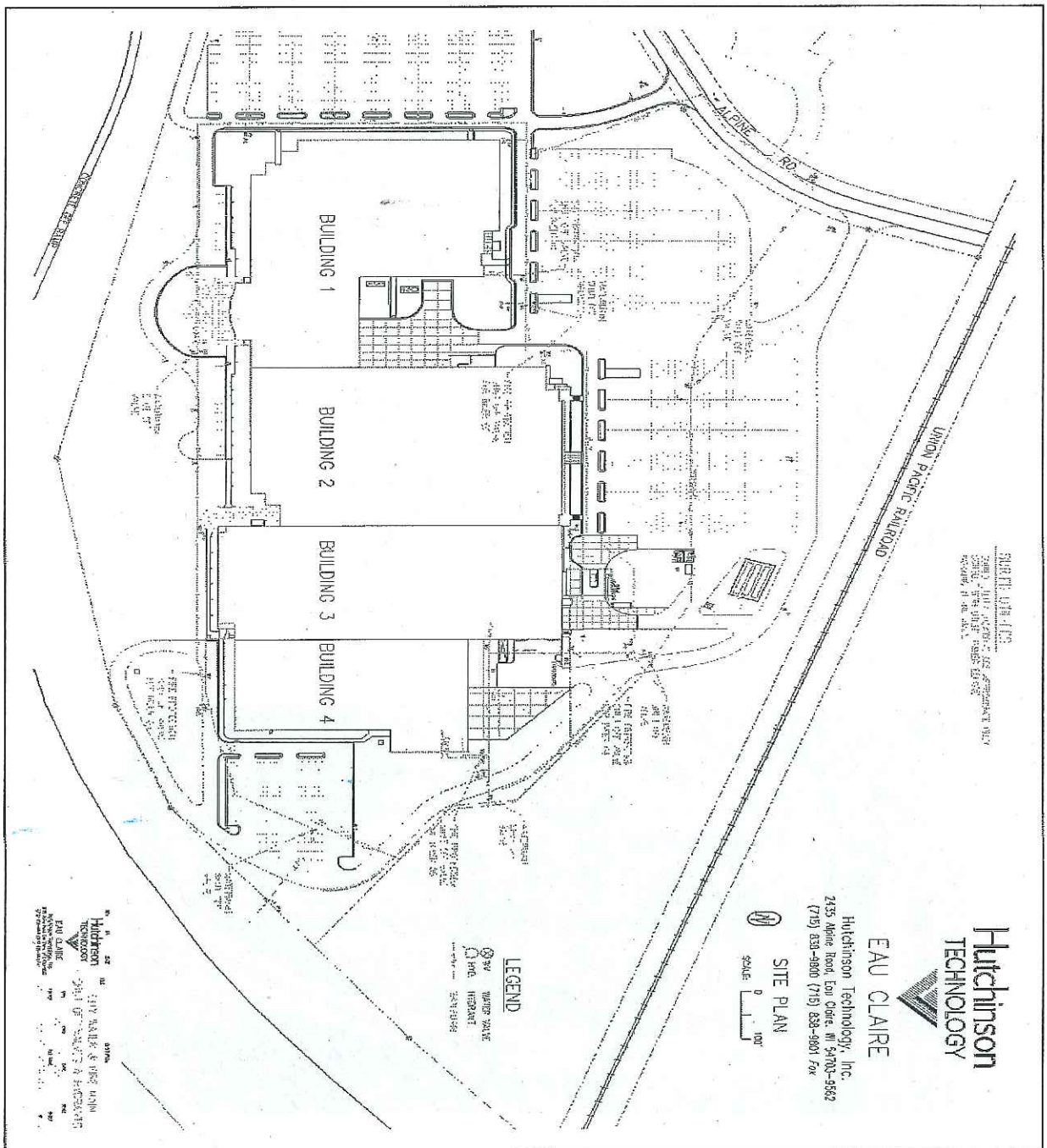


Satellite view of the Hutchison Technology Inc Eau Claire Facility



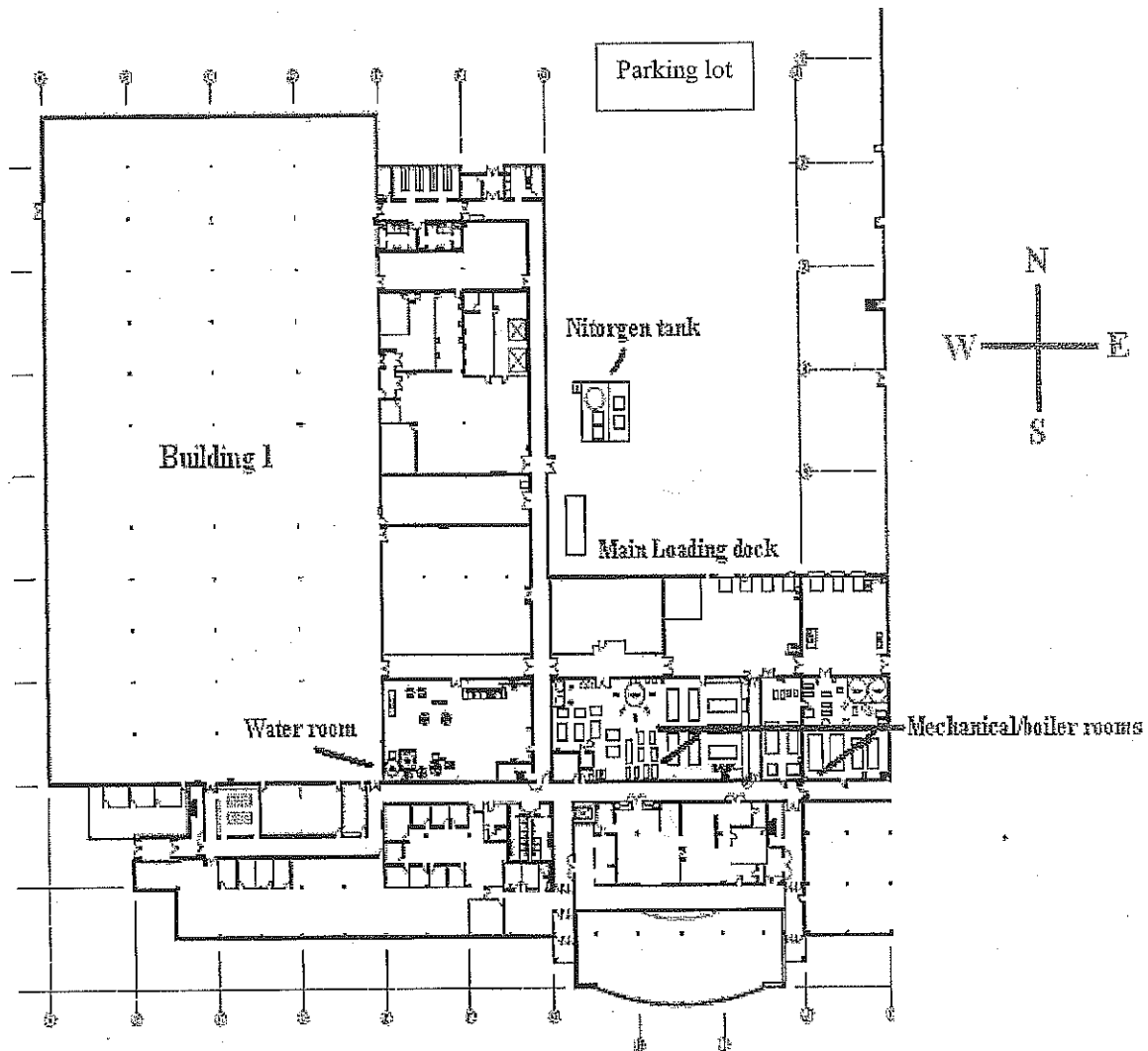
The following diagrams show the building layout of the Hutchinson Technology Eau Claire facility.

Note Buildings 2, 3 and 4 have basements.



Building # 1 main floor

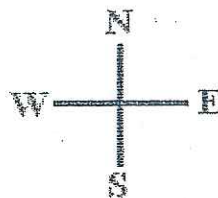
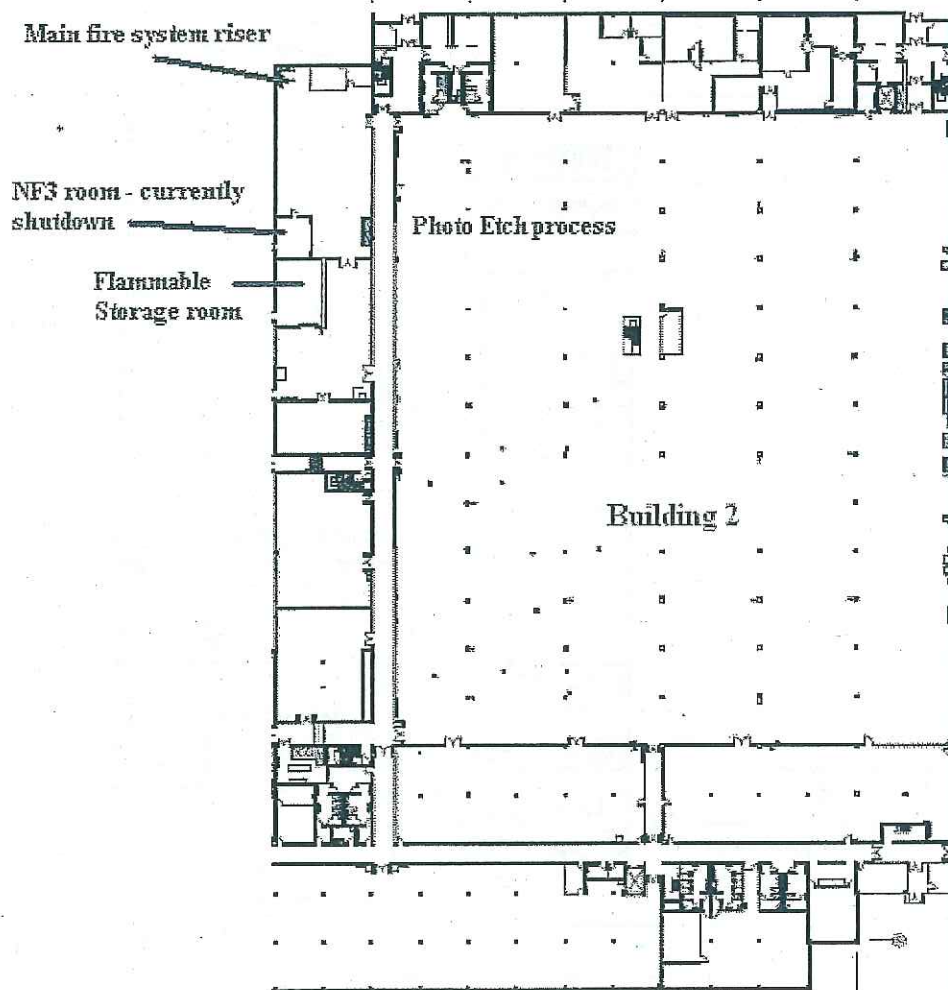
Building one is comprised mainly of mechanical process equipment, and contains small amounts of Fluorine Gas, Acetone, and IPA. . The following drawing is a break down of the main floor of building one with key areas marked. Note; there is limited crawl space under this section of the building, and there is no basement.



10/22/20132/4/2015

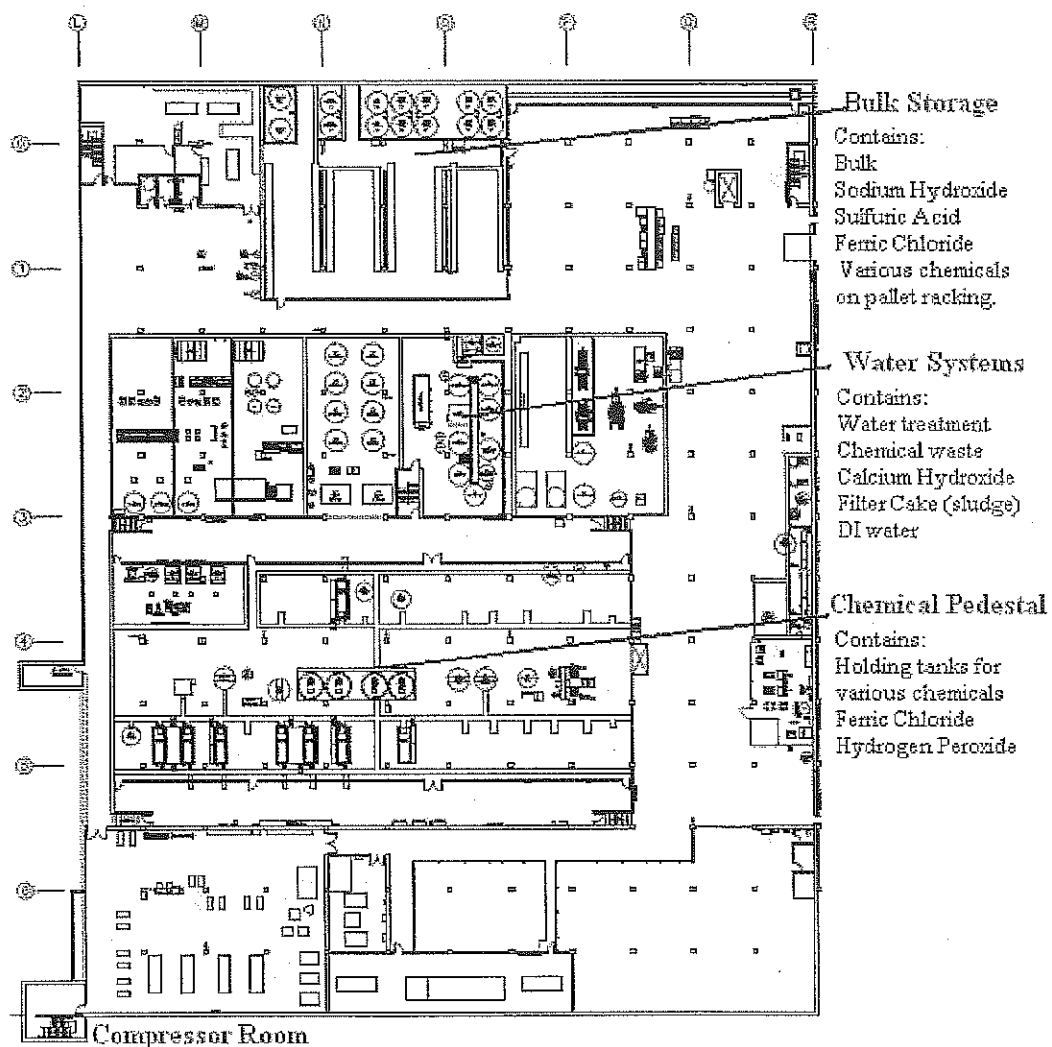
Building #2 Main Floor

Building # 2 main floor is made up of various wet processes that utilize many of the chemicals mentioned earlier in this report. Along with the process equipment, along the Western part of this building are the Flammable storage area, NF3 room (currently not in use) and the main fire system riser.



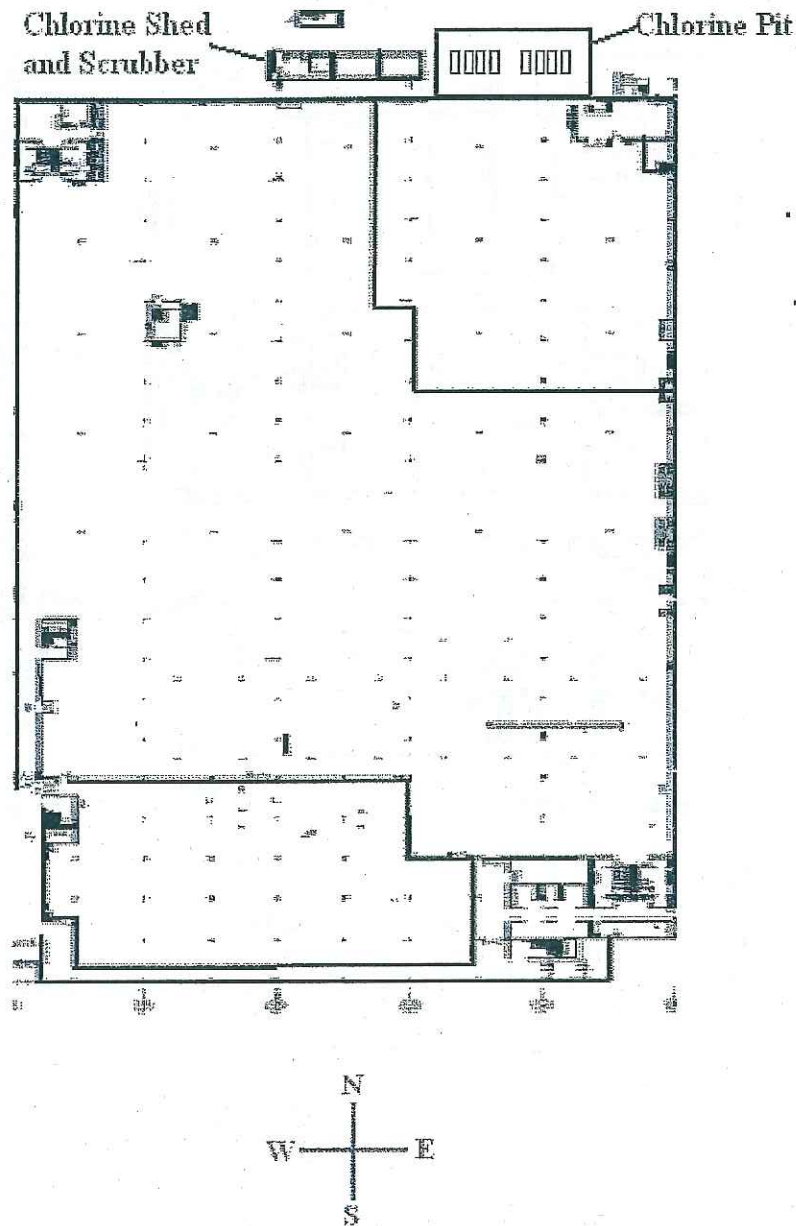
Building # 2 Basement Level

The basement of building two holds a large majority of chemicals for the HTI facility. There is Bulk storage which holds the majority of chemicals, along with the pedestal area. Building two basement also houses one of the on site water system processes.



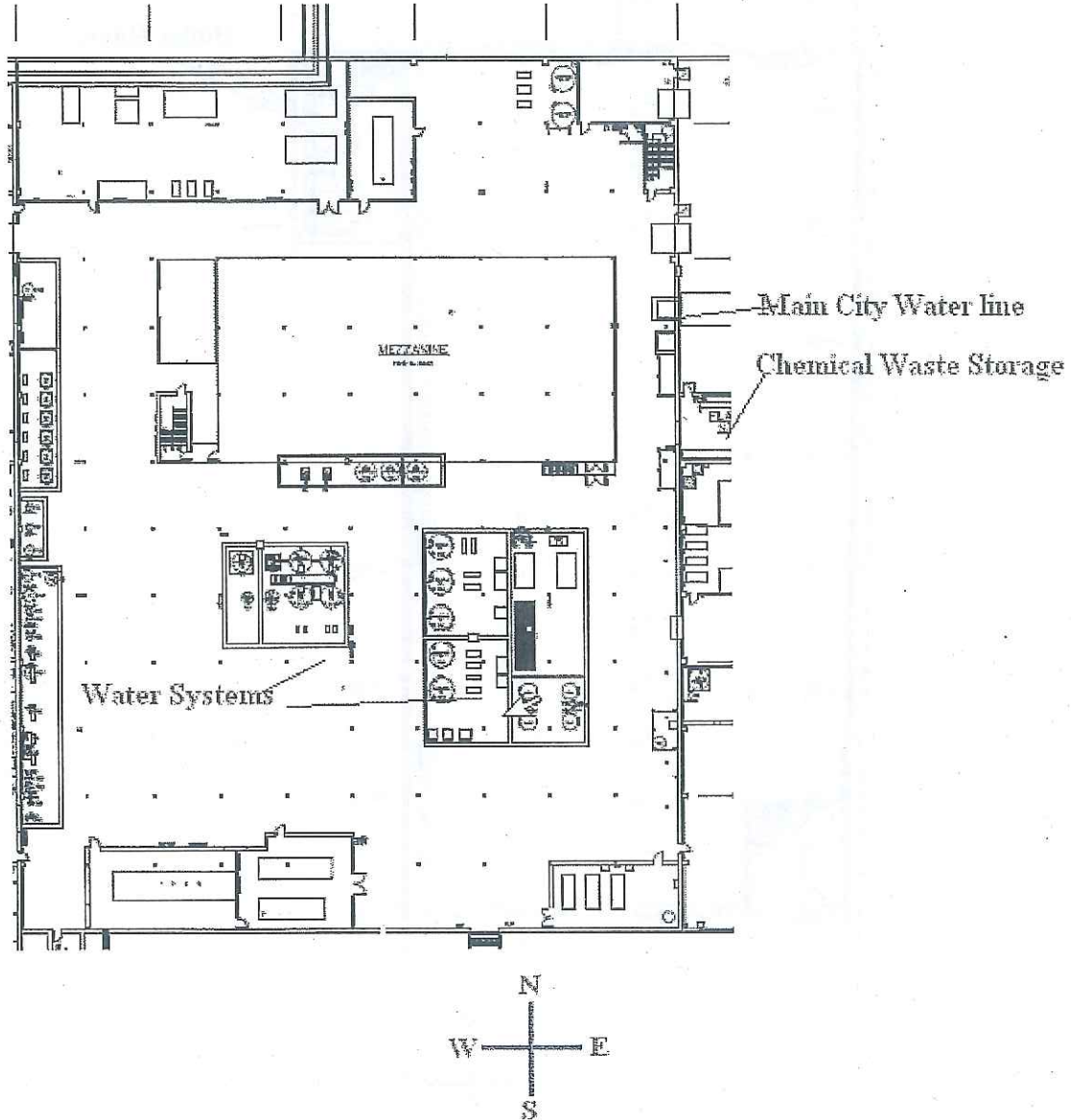
Building # 3 Main Floor

The main floor of building three houses mainly the old trace process where most of the processes have been shutdown. Although this process is shutdown, some of the machines may be ran from time to time for testing. The one main area of focus is on the North East side of the building is the Chlorine Pit and Scrubber mentioned earlier in this report.



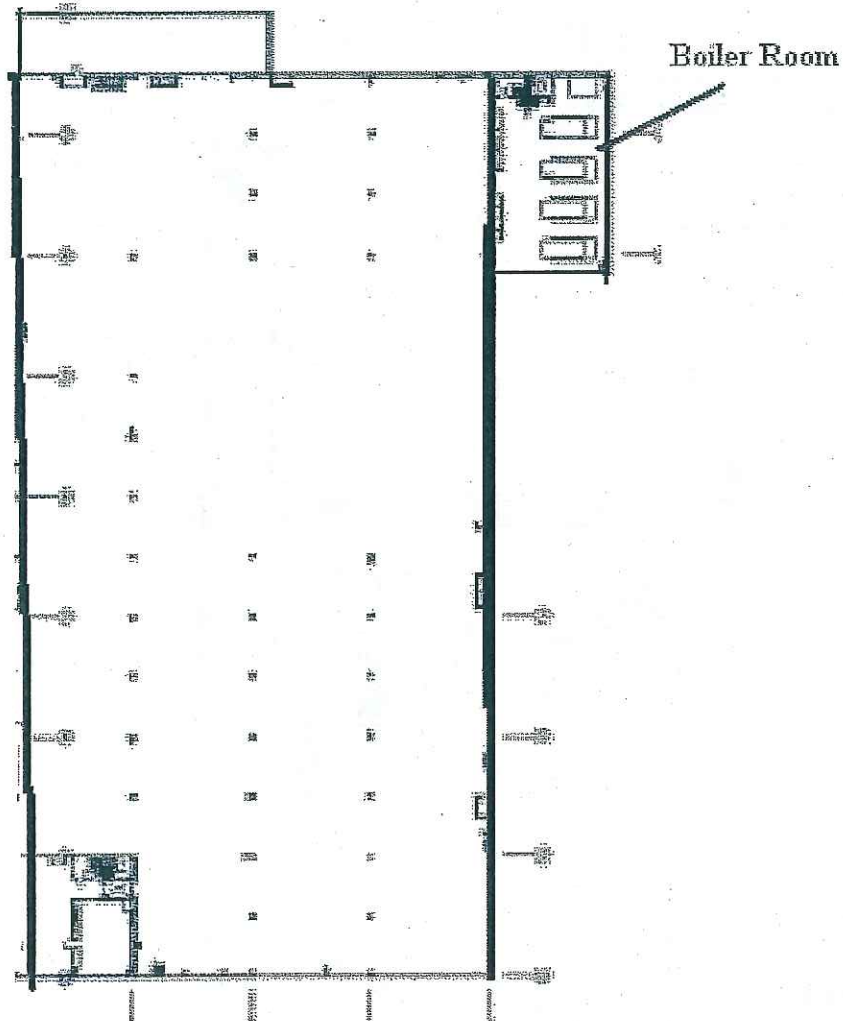
Building # 3 Basement Level

Building three basement houses various chemicals holding tanks along with a main area where various chemical wastes are stored. Along with this, there is a water treatment area located on the south side of the building.



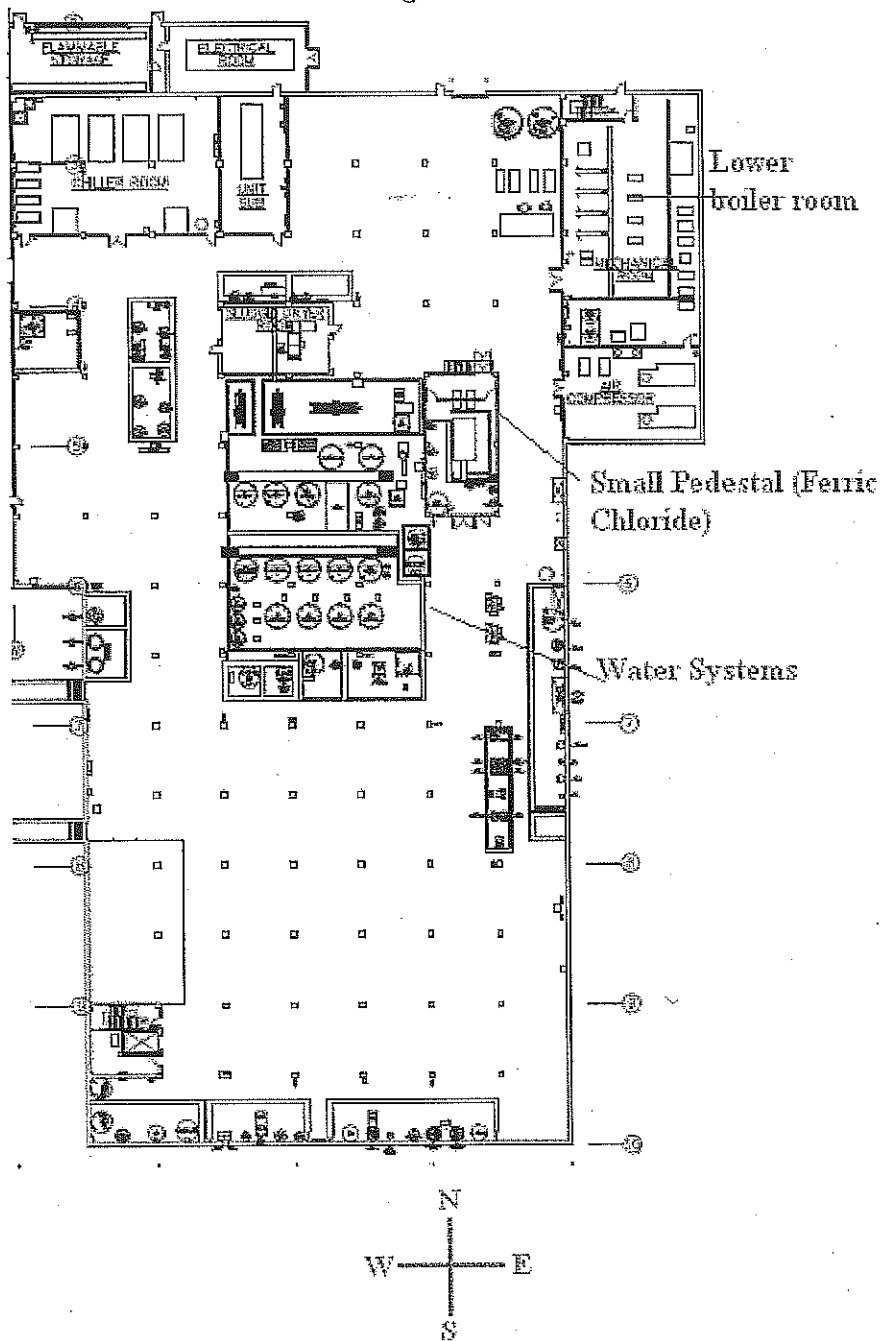
Building #4 Main level

The building four main level is comprised of the main TSA+ process which utilizes mainly wet processes to create the product. Along with the process there is a large boiler room located on the East side of the building.



Building #4 Basement

The basement of building four houses various chemicals holding tanks that support the wet process on the main level of the building.



The safety and well being of both the HTI employees and surrounding public is a high priority for Hutchison Technology. With the types and amounts of chemicals on site, we strive to maintain a top notch facility, by completing periodic audits, drills, and maintenance to all of our environmental and safety equipment. We will ensure that we will do our best to maintain a safe and environmentally responsible company.

ATTACHMENT F: Hazardous Waste Contingency Plan

HAZARDOUS WASTE CONTINGENCY PLAN
AND
EMERGENCY PROCEDURES

HUTCHINSON TECHNOLOGY INCORPORATED
2435 ALPINE ROAD
EAU CLAIRE, WISCONSIN 54703-9562
EPA GENERATOR I.D.: WIR000002480

10/22/2013

This plan has been prepared in accordance with 40 CFR Part 265.50 Subpart D and NR 630.22.

The purpose of this plan is to prevent or minimize human health or environmental damage in the event of fire, explosion, or unplanned discharge of hazardous waste or hazardous waste constituents to air, land, groundwater, or surface water. The provisions of this plan shall be implemented immediately in the event of a fire, explosion, or discharge of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

This plan covers eight areas:

1. General Information
2. Emergency Coordinators
3. Facility Information
4. Evacuation Plan
5. Emergency Response Procedures
6. Emergency Equipment
7. Emergency Services Agreements
8. Required Reports

SECTION 1-GENERAL INFORMATION

- A. Company: Hutchinson Technology Incorporated
- B. Location: 2435 Alpine Road
Eau Claire, Wisconsin 54703
(See attached site map)
- C. President: Richard J Penn
40 West Highland Park Drive
Hutchinson, MN 55350-9784
(Company Headquarters)
- 27825 Brynmawr Place
Shorewood, MN 55331-8236
(Home address)
- D. Facility Type: Short-term (90 days or less) storage facility for hazardous waste chemicals used in the manufacturing process. This site is classified as a large quantity generator.

SECTION 2 - EMERGENCY COORDINATORS

A. Primary Emergency Coordinator

Name: Bernie Stolarz
Position: Environmental / Safety Engineer
Address: 6150 34th St.
Elk Mound, WI 54739
Home Phone: (715) 874-4487
Cell Phone: (541) 556-5912
Work Phone: (715) 838-9800 ext 4338

B. Secondary Emergency Coordinator

Name: Chris Maurina
Position: Safety Supervisor
Address: 1550 Red Pine Drive
Eau Claire, WI 54701
Home Phone: (715) 838-9636
Cell Phone: (715) 579-3398
Work Phone: (715) 838-9800 ext. 7082

C. Secondary Emergency Coordinator

Name: Korey Klammer
Position: Safety Coordinator
Address: 4453 Heartland Drive W
Eau Claire, WI 54701
Home Phone: (715) 552-1887
Cell Phone: (715) 579-4605
Work Phone: (715) 838-9800 ext. 7050

D. Emergency Telephone Numbers: (Note: Dial 9 first to achieve an outside phone line.)

Police	9-911
Fire	9-911

Ambulance	9-911
Sacred Heart Hospital	
General Information	9-715-839-4121
24-Hour Emergency Center	9-715-839-4222
Emergency Room Fax	9-715-839-4119
Luther Hospital	
General Information	9-715-838-3311
Emergency Department	9-715-838-3242
Site Intercom	6500
Poison Control Center	9-1-800-764-7661
Emergency Government (24 Hour)	9-1-800-943-0003
National Response Center (24 Hour)	9-1-800-424-8802
Chemtrec (Emergency Chemical Info)	9-1-800-424-9300
Bay West (Industrial spill remediation)	9-1-800-279-0456

SECTION 3 - FACILITY INFORMATION

The provisions of the plan will be carried out immediately at the facility whenever there is a fire, explosion, or a release of a hazardous material which could threaten human health or the environment.

A. Main chemicals on site (not all are listed)

1. Sulfuric Acid
2. Sodium Hydroxide
3. Hydrochloric Acid
4. Liquid Oxygen
5. Liquid Argon
6. Liquid Nitrogen
7. Acetone
8. Cupric Chloride
9. Monoethanolamine
10. Nitrogen Trifluoride
11. Potassium Cyanide
12. Isopropyl Alcohol
13. Ferric Chloride
14. Hydrogen Peroxide
15. Nitric Acid
16. Chlorine

SECTION 4 - EVACUATION PLAN

- A. Facility personnel will be evacuated if the Emergency Coordinator or Emergency Management Services (EMS) personnel determine that personnel safety is in danger.
- B. If evacuation is necessary, the facility alarm system will be activated.
- C. Employees will evacuate the building and meet in the parking lot areas. (See attached exit maps)
- D. Evacuation practice drills will be held once per year.

SECTION 5 - EMERGENCY RESPONSE PROCEDURES

The emergency procedures required in the event of a spill, fire, explosion, or other incident that could release hazardous material into the air, soil, groundwater, surface water are as follows:

A. Any employee who discovers a hazardous material release must notify their supervisor or the Emergency Management Services (EMS)/ Hazmat group at 4-911. If the situation warrants, the employee may pull the nearest fire alarm and evacuate the building.

B. The EMS must contact the Emergency Coordinator and/or alternate coordinators listed in Section 2 as well as any appropriate parties listed in Section 8, if necessary.

C. The EMS is responsible for coordinating the facility response to emergency incidents. The situation will be addressed and the appropriate response taken, which may include the following:

1. Activation of internal alarms (fire pull stations) and evacuation of the plant.
2. Notification of the Eau Claire Police and/or Fire and Rescue

with information on the nature of the incident and the type and quantity of material released.

D. The Emergency Coordinator is responsible for notification of the proper local, state, and federal agencies with the following information (to include the Division of Emergency Government):

1. Name and telephone number of the reporter.
2. Name and address of the facility.
3. Time and type of incident
4. Name and quantity of material(s) involved, to the extent known.
5. The extent of injuries, if any.
6. The possible hazards to human health or the environment, outside the facility.
7. Immediately identify the character, source, amount, and area Extent of any discharged materials. This may be done by observation or review of facility records or manifests, and, if necessary, by chemical analysis.
8. Assess possible hazards to human health or the environment which may result from the discharge, fire, explosion. This assessment will consider both direct and indirect effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat induced explosion.
9. Take all reasonable measures necessary to ensure that fires, explosions and discharges do not occur, recur or spread to other hazardous waste at the facility. These measures will include, where applicable, stopping processes and operations, collecting and containing discharge waste, and removing or isolating Containers.

10. Monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes or other equipment, where appropriate, if the facility stops operation in response to a fire, explosions or discharge.
 11. Provide for treating, storing or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a discharge, fire or explosion at the facility, immediately after an emergency.
 12. Ensure that, in the affected areas of the facility, no waste that may be incompatible with the discharged material is treated, stored or disposed of until cleanup procedures are completed; and all emergency equipment listed in the contingency plan is clean and fit for its intended use before operations are resumed.
- E. The Emergency Coordinator must notify the EPA Region V Administrator, and other appropriate state and local authorities that the facility is in compliance before operations are resumed in the affected area(s) of the facility.

SECTION 6 - EMERGENCY EQUIPMENT

- A. The facility is equipped with an alarm system that can be activated from, and is audible in, each work area. The system is activated via the internal phone system.

Note: Chemicals such as Chlorine, Fluorine, Nitrogen Trifluoride, Hydrochloric Acid, and Hydrogen Fluoride are constantly monitored by an onsite monitoring system. In the case that one of these chemicals were to be released into the environment, the alarm system automatically activates.

- B. Each area is equipped with an appropriate fire extinguisher, emergency shower and eyewash.
- C. The facility is served by 10 fire hydrants.
- D. The facility is equipped with an automatically-activated sprinkler system.

E. The facility is equipped with a paging system that can be activated from, and is audible in, each work area.

F. The EMS/Hazmat group has the following at their disposal:

1. Personal Protective/Emergency Response Equipment

- a. Neoprene rubber gloves
- b. Chemical resistant sleeves
- c. Face shields
- d. Eye goggles
- e. Neoprene rubber aprons
- f. Chemical resistant rubber boots
- g. Respirators (full and half mask)
- h. Self contained breathing apparatus
- i. Fall protection Harnesses
- j. Level B suits
- k. Hand Held Sperrian CL2 monitors.
- l. MSA four gas monitor.
- m. Zellweger NF3/HF portable monitor.

2. Other Equipment

- a. Spill cart
- b. 2-way radios/spectralink phones
- c. Barrel over pack.
- d. On site trench system
- e. On site water treatment system.

SECTION 7 - EMERGENCY SERVICES AGREEMENTS

A. Police - The Eau Claire Police force is available to direct traffic, handle crowds, and provide security services.

B. Fire Department - The Eau Claire Fire Department will respond to fires and other emergency incidents providing fire protection and rescue/ambulance services. Eau Claire County has a Level B Hazardous Materials Response team which is coordinated through the Fire Department.

C. Hospital - Sacred Heart Hospital and Luther Hospital are available to provide medical services.

D. Emergency Response Contractor -

Large chemical spill clean-up:

Bay West Incorporated

5 Empire Drive

St. Paul, MN 55103-1867

(800) 279 - 0456

(612) 291 - 0456

SECTION 8 - REQUIRED REPORTS

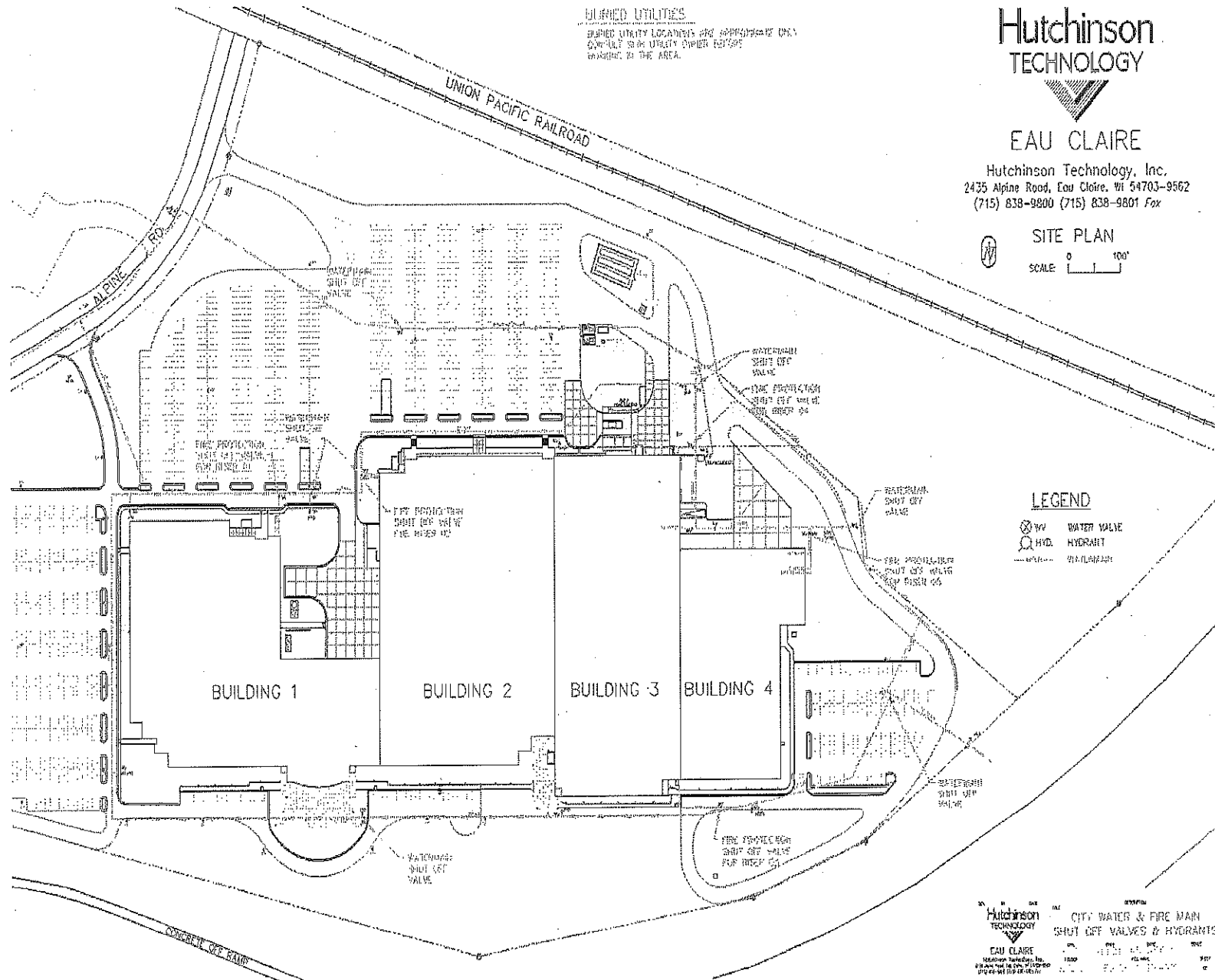
A. The owner or owner's representative must note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within 15 days after the incident, a written report must be submitted on the incident to the EPA Region V Administrator and the Local Emergency Government Coordinator.

The report must include:

1. Name, address and telephone number of the owner or owner's representative.
2. Name, address and telephone number of the facility.
3. Date, time and type of incident, such as fire or explosion.
4. Name and quantity of materials involved.

5. The extent of injuries, if any.
 6. An assessment of actual or potential hazards to human health or the environment, where this is applicable.
 7. Estimated quantity and disposition of recovered material that resulted from the incident.
 8. A narrative describing the known or suspected causes of the incident and a statement describing the measures taken to investigate the cause. The narrative must also describe any necessary measures which have been or will be taken to prevent the incidents in the future.
- B. The Emergency Coordinator will revise this contingency plan in accordance with the experience acquired during each emergency situation or any other change, and will send copies of the revisions to each holder of the original plan.

EC Site Plan



BUILDING 1

BUILDING 2

BUILDING 3

BUILDING 4

MUSTER AREA

MUSTER AREA

MUSTER AREA

MUSTER AREA

MAIN ENTRANCE

EMERGENCY SHELTER/EVACUATION EXIT ROUTE

LEGEND

0 FIRST FLOOR PLAN

EMERGENCY SHELTER/EVACUATION EXIT ROUTE

0 100 FEET

0 200 FEET

0 300 FEET

0 400 FEET

0 500 FEET

0 600 FEET

0 700 FEET

0 800 FEET

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ATTACHMENT G: Inspection Checklists



Revision: 12/03/2012
WASTE & MATERIALS
MANAGEMENT PROGRAM

LARGE QUANTITY GENERATOR INSPECTION

This Inspection Form, used for the inspection of facilities that generate over 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month or over 1 kg of acute hazardous waste in a calendar month, evaluates compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 650 - 679, Wis. Admin. Code).

Section 1: Waste Information

A. Hazardous waste determination has been made on each solid waste generated.	<input checked="" type="checkbox"/>	662.011
B. Waste determination was made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used.	<input checked="" type="checkbox"/>	662.011(3)
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers.	<input checked="" type="checkbox"/>	662.011(3)(a)1
D. Generator keeps records of all waste determinations on-site for at least three years from the date the waste was last sent to a storage, treatment or disposal facility.	<input checked="" type="checkbox"/>	662.040(3)
E. Generator submitted a notification form and obtained an EPA ID#.	<input checked="" type="checkbox"/>	662.012
Note: A subsequent notification should be submitted when there is an ownership or name change.		

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

A. Generator initiated a manifest with all off-site shipments of hazardous waste.	<input checked="" type="checkbox"/>	662.020(1)
B. The manifest is used according to the instructions in the appendix to 40 CFR part 262.	<input checked="" type="checkbox"/>	662.020(1)
C. The facility designated on the manifest is permitted or licensed to accept the waste.	<input checked="" type="checkbox"/>	662.020(2)
D. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility.	<input checked="" type="checkbox"/>	662.023(3)
E. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262.	<input checked="" type="checkbox"/>	662.020(1)
F. If the generator received a shipment back as a rejected load, the returned waste was accumulated in compliance with the container or tank standards for less than 90 days.	NA	662.034(13)
G. Upon receipt of the rejected shipment, the generator signed EITHER of the following: 1. Manifest Item 18c if the transporter returned the shipment using the original manifest. 2. Manifest Item 20 if the transporter returned the shipment using a new manifest.	NA	662.034(13)
H. A copy of the manifest signed by the generator is retained until the signed copy from the designated facility is received.	<input checked="" type="checkbox"/>	662.040(1)
I. Copy of each manifest is kept for at least three years from the date of shipment.	<input checked="" type="checkbox"/>	662.040(1)
J. Hazardous waste is packaged according to applicable DOT requirements before transport.	<input checked="" type="checkbox"/>	662.030



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LARGE QUANTITY GENERATOR INSPECTION

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

K. Hazardous waste is labeled according to applicable DOT requirements before transport.	<input checked="" type="checkbox"/>	662.031
L. Hazardous waste is marked according to applicable DOT requirements before transport.	<input checked="" type="checkbox"/>	662.032(1)
M. Containers of 119 gallons and less are marked with the "Hazardous Waste-Federal law prohibit improper disposal" label before transport.	<input checked="" type="checkbox"/>	662.032(2)
N. Placards are offered to the initial transporter.	<input checked="" type="checkbox"/>	662.033

Section 3: Land Disposal Restrictions

A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge.	<input checked="" type="checkbox"/>	668.07(1)
B. Generator complies with the prohibition against dilution of wastes.	<input checked="" type="checkbox"/>	668.03
C. A one-time written notice was sent to each treatment, storage or disposal facility with the initial waste shipment.	<input checked="" type="checkbox"/>	668.07(1)
D. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	<input checked="" type="checkbox"/>	668.07(1)
E. If the waste MEETS treatment standards, the LDR notice certifies wastes may be land disposed without further treatment.	NA	668.07(1)
F. If the waste EXCEEDS treatment standards, the LDR notice gives notification of appropriate treatment and applicable prohibitions.	<input checked="" type="checkbox"/>	668.07(1)
G. A copy of the LDR notifications and certifications are retained for at least 3 years from the date the waste was last sent off-site.	<input checked="" type="checkbox"/>	668.07(1)(h)
H. Underlying hazardous constituents have been identified for characteristic wastes.	<input checked="" type="checkbox"/>	668.09(1)
I. Generator identifies EITHER of the following when the waste is both a listed and characteristic waste: 1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste codes. 2. The treatment standards for all applicable listed and characteristic waste codes.	<input checked="" type="checkbox"/>	668.09(2)
J. If waste is treated in containers or tanks, the generator meets BOTH of the following (NR 668.07(1)(e): 1. Developed a written waste analysis plan describing the procedures used to meet applicable LDR treatment standards. 2. Complies with the certification requirements in NR 668.07(1)(c).	NA	662.034(1)(d)

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected
Noncode ? : Y: Yes N: No UN: Unknown

Notes : *: Dept. approved alternate may apply No 'box' is an open ended question



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MANAGEMENT PROGRAM

LARGE QUANTITY GENERATOR INSPECTION

Section 4: Annual Reports and Exception Reporting

A. Annual reports covering generator activities during the calendar year have been submitted to the Department by March 1 of the following year.	<input checked="" type="checkbox"/>	662.041
B. Transporter or TSD is contacted if signed manifest is not received in 35 days.	<input checked="" type="checkbox"/>	662.042(1)
C. Exception report is submitted to the Department if a signed manifest is not received within 45 days.	<input checked="" type="checkbox"/>	662.042(2)
D. Copy of each annual report and exception report is kept for at least 3 years from the date of the report.	<input checked="" type="checkbox"/>	662.040(2)

Section 5: Preparedness and Prevention

A. Generator has ALL of the following, unless the equipment is not necessary for the types of wastes handled (NR 665.0032): 1. Device to summon emergency assistance (e.g., telephone, 2 way radio). 2. Internal communications and alarm systems. 3. Portable fire extinguishers. 4. Fire control equipment, including special extinguishing equipment. 5. Spill control equipment. 6. Decontamination equipment (e.g., eyewash, shower). 7. Water at adequate volume and pressure to supply water spray systems.	<input checked="" type="checkbox"/>	662.034(1)(d)
B. All of the above emergency equipment is tested and maintained to assure its proper operation in an emergency (NR 665.0033).	<input checked="" type="checkbox"/>	662.034(1)(d)
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas (NR 665.0034).	<input checked="" type="checkbox"/>	662.034(1)(d)
D. Generator has made ALL of the following arrangements with emergency organizations (NR 665.0037): 1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. 2. Police, fire and emergency response teams are familiar with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes. 3. Agreements are made with emergency response contractors and equipment suppliers. 4. Local hospitals are familiar with the properties of wastes handled and the types of injuries or illnesses that could result from an emergency.	<input checked="" type="checkbox"/>	662.034(1)(d)
E. Aisle space provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment (NR 665.0035).	<input checked="" type="checkbox"/>	662.034(1)(d)

Section 6: Contingency Plan and Emergency Procedures

A. Generator has a written contingency plan, amended SPCC plan or other emergency plan that will be implemented immediately in the event of a fire, explosion or hazardous waste discharge (NR 665.0051). If there is no written plan go to question 7.A.	<input checked="" type="checkbox"/>	662.034(1)(d)
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Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected

Noncode ? : Y: Yes N: No UN: Unknown

Notes : *: Dept. approved alternate may apply

No 'box' is an open ended question

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MANAGEMENT PROGRAM

LARGE QUANTITY GENERATOR INSPECTION

Section 6: Contingency Plan and Emergency Procedures

B. Generator has amended a SPCC plan or other emergency plan so it sufficiently incorporates hazardous waste management provisions (NR 665.0052(2)).	<input type="checkbox"/>	662.034(1)(d)
C. Copies of the contingency plan and all revisions have been made available to police, fire, hospital and emergency response teams. (NR 665.0053(2)).	<input checked="" type="checkbox"/>	662.034(1)(d)
D. Contingency plan was amended due to ANY of the following (NR 665.0054): 1. Contingency plan failed in an emergency. 2. <u>Change in site design, construction, O&M, or other circumstances which affect emergency response.</u> 3. Emergency coordinators changed. 4. Emergency equipment changed.	<input checked="" type="checkbox"/>	662.034(1)(d)
E. Contingency plan identifies an emergency coordinator who meets ALL of the following (NR 665.0055): 1. Available or on call to coordinate emergency response measures. 2. Familiar with all aspects of site activities and the contingency plan. 3. Has authority to commit the resources needed to carry out the contingency plan.	<input checked="" type="checkbox"/>	662.034(1)(d)
F. Contingency plan includes ALL of the following (NR 665.0052): 1. Designation of the primary emergency coordinator, with alternates listed in the order of assuming responsibility. 2. Name, address and phone number, office and home, for each emergency coordinator. 3. Description of the arrangements agreed to by the police, fire, hospitals and emergency response teams to coordinate emergency services. 4. Evacuation plan for personnel including signal(s) to be used in the event of evacuation and alternate routes. 5. Actions facility personnel will take in response to a fire, explosion, or hazardous waste discharge. 6. <u>List of emergency equipment at the site, including location, description and capabilities of each item.</u>	<input checked="" type="checkbox"/>	662.034(1)(d)
G. Contingency plan requires the emergency coordinator to do ALL of the following in the event of a fire, explosion, or discharge of hazardous wastes (NR 665.0056): 1. Activate internal alarms or communication systems. 2. Notify appropriate authorities, if their help is needed. 3. Identify the character, source, amount, and extent of discharged hazardous materials. 4. Assess hazards to human health and the environment. 5. If the incident threatens human health or the environment outside the facility, notify local authorities that evacuation may be necessary and notify the national response center (800-424-8802) and the division of emergency government (800-943-0003). 6. Take all reasonable measures necessary to ensure fires, explosions and discharges do not occur, reoccur, or spread. 7. Monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes, or other equipment if the site stops operation. 8. Provide for treating, storing, or disposing of recovered waste, contaminated soil, surface water, or other material. 9. Ensure wastes that are incompatible with the released material are not treated, stored or disposed until cleanup is completed. 10. Ensure that emergency equipment is clean and fit for use prior to resuming operations. 11. Notify the department and appropriate state and local authorities before resuming operations. 12. Submit an incident report to the department within 15 days.	<input checked="" type="checkbox"/>	662.034(1)(d)



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Section 7: Personnel Training Requirements

A. Generator has a program of classroom instruction or on-the-job training for personnel in hazardous waste management (NR 665.0016(1)(a)). If there is no training program go to question 8.A.	<input checked="" type="checkbox"/>	662.034(1)(d)
B. Program is directed by a person trained in hazardous waste management procedures (NR 665.0016(1)(b)).	<input checked="" type="checkbox"/>	662.034(1)(d)
C. Program teaches facility personnel hazardous waste management procedures relevant to the positions in which they are employed (NR 665.0016(1)(b)).	<input checked="" type="checkbox"/>	662.034(1)(d)
D. Training program ensures personnel are able to respond effectively to emergencies by familiarizing them with the following applicable items (NR 665.0016(1)(c)): 1. Contingency plan implementation. 2. Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment. 3. Key parameters for automatic waste feed cut-off systems. 4. Communications and alarm systems. 5. Response to fires or explosions. 6. Response to groundwater contamination incidents. 7. Shutdown of operations.	<input checked="" type="checkbox"/>	662.034(1)(d)
E. New employees are trained within 6 months of their assignment (NR 665.0016(2)).	<input checked="" type="checkbox"/>	662.034(1)(d)
F. Employees work in supervised positions until they have completed the training (NR 665.0016(2)).	<input checked="" type="checkbox"/>	662.034(1)(d)
G. Personnel take part in an annual review of the training (NR 665.0016(3)).	<input checked="" type="checkbox"/>	662.034(1)(d)
H. Generator keeps ALL of the following training documents (NR 665.0016(4)): 1. Job title and the employee name for each position related to hazardous waste management. 2. Job description for each of the above job titles. 3. Description of the amount and type of introductory and continuing training that will be given to each employee. 4. Records that required training has been given to each employee.	<input checked="" type="checkbox"/>	662.034(1)(d)
I. Training records are maintained until closure for current personnel and at least 3 years from the date the employee last worked at the facility (NR 665.0016(5)).	<input checked="" type="checkbox"/>	662.034(1)(d)

Section 8: 90-Day Container Accumulation

A. Waste is accumulated in containers. If NO, go to Section 9.	<input checked="" type="checkbox"/>	
B. Accumulation start date is clearly marked and visible for inspection on each container.	<input checked="" type="checkbox"/>	662.034(1)(b)
C. All containers are clearly marked with the words "Hazardous Waste".	<input checked="" type="checkbox"/>	662.034(1)(c)

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected
Noncode ? : Y: Yes N: No UN: Unknown

Notes : *: Dept. approved alternate may apply No 'box' is an open ended question



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Section 8: 90-Day Container Accumulation

D. If container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	NA	662.034(1)(a)1
E. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	✓	662.034(1)(a)1
F. Containers are kept closed, except when it is necessary to add or remove waste (NR 665.0173(1)).	✓	662.034(1)(a)1
G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).	✓	662.034(1)(a)1
H. Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174).	✓	662.034(1)(a)1
I. Containers of ignifable or reactive waste are located at least 50 feet from the property line (NR 665.0176).	✓	662.034(1)(a)1
J. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device) (NR 665.0177(3)).	✓	662.034(1)(a)1
K. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	✓	662.034(1)(a)1
L. Containers that previously held waste are properly washed before adding incompatible waste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(2)).	✓	662.034(1)(a)1

Section 9: Subchapter BB Standards for Equipment Leaks

A. Generator operates any of the following equipment containing or contacting hazardous wastes with organic concentration $\geq 10\%$ by weight. If NO, go to Section 10 (NR 662.034(1)(a), NR 665.1050(2). 1. Pumps in light liquid service. 2. Compressors. 3. Pressure relief devices in gas or vapor service. 4. Sampling connection systems. 5. Open-ended valves or lines. 6. Valves in gas or vapor service or in light liquid service. 7. Pumps or valves in heavy liquid service. 8. Pressure relief devices in light liquid or heavy liquid service. 9. Flanges or other connectors.	NA	
B. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it is in vacuum service and individually listed in the facility operating record by an identification number (NR 665.1050(4), NR 665.1064(7)(e)).		662.034(1)(a)
C. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it operates < 300 hours per calendar year and is identified, either by list or location (area or group), in the facility operating record. (NR 665.1050(5), NR 665.1064(7)(f)).		662.034(1)(a)



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Section 9: Subchapter BB Standards for Equipment Leaks

D. If the facility determines compliance with subch. BB by documenting compliance with Clean Air Act requirements, the documentation is readily available as part of the operating record (NR 665.1064(13)).	NA	662.034(1)(a)
E. ALL of the following information used to determine the applicability of exclusions in Questions 9.B. - 9.D. is maintained at the facility (NR 665.1064(11)): 1. Analysis determining the design capacity of the hazardous waste management unit. 2. Statement listing the hazardous waste influent to and effluent from each hazardous waste management unit subject to subch. BB and an analysis determining whether these hazardous wastes are heavy liquids. 3. Up-to-date analysis and the supporting information used to determine whether or not equipment is subject to subch. BB.		662.034(1)(a)
F. When knowledge of the nature of the hazardous waste stream or the process by which it was produced is used to determine the applicability of the exclusions, supporting documentation such as the following are maintained at the facility (NR 665.1064(11)): 1. Information that the production process does not use organic compounds. 2. The process is identical to a process at another facility where the total organic content was measured at <10%. 3. The process has not changed to affect the total organic concentration of the waste.		662.034(1)(a)
G. The facility keeps records of new determinations performed when there are any changes that could result in an increase in the total organic content of the waste in contact with equipment that is not subject to subch. BB requirements (NR 665.1064(11)).		662.034(1)(a)
H. All equipment stated in Question 9.A. is excluded from additional subch. BB requirements. If NO, complete the subch. BB inspection form.		

Section 10: Subchapter CC Level 1 Container Standards

A. The facility manages hazardous waste in containers with EITHER of the following design capacities. If NO, go to Question 11.A. (NR 665.1087(2)(a), NR 662.034(1)(a)1). 1. Between 26 and 119 gallons. 2. Greater than 119 gallons and not in light material service.	✓	
B. Containers are exempt from CC regulation because of ALL of the following (NR 662.034(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)2., NR 665.1084(1)(b)): 1. The average VO concentration at the point of origination is <500 ppmw for all hazardous waste entering the container. 2. The initial determination of the average VO concentration for the waste stream was made before the material was placed in the container. 3. The initial determination is reviewed and updated at least once every 12 months. 4. A new waste determination is performed whenever changes to the source generating the waste stream likely causes the average VO concentration to increase to >= 500 ppmw. 5. The average VO concentration is determined by direct measurement or by knowledge. Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.	NA	
C. For each waste determination, the date, time, and location of each waste sample collected are maintained in the facility records (NR 665.1090(6)(a)).	NA	662.034(1)(a)1
D. Containers are excluded from subch. CC because they are used to store or treat hazardous waste from organic peroxide manufacturing processes (NR 662.034(1)(a)1, NR 665.1080(4)). Note: Certain records are to be maintained. Refer to 665.1090(9) for more information.	NA	



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Section 10: Subchapter CC Level 1 Container Standards

E. Containers are excluded from subch. CC because they are used solely to store or treat EITHER of the following (NR 662.034(1)(a)1, NR 665.1080(2), NR 665.1090(10)): 1. On-site remediation wastes generated through NR 700 or RCRA corrective action activities. 2. Radioactive mixed wastes in accordance with NRC requirements	NA	
F. Containers are excluded from subch. CC because BOTH of the following are met (NR 665.1080(2), NR 665.1090(10)): 1. They are equipped with air emission controls operated in accordance with the Clean Air Act requirements. 2. Facility records include certification of such by the owner or operator and the specific air program compliance requirements for the containers	NA	
G. All containers are excluded from subch. CC Level 1 standards. If YES, go to Section 11.	✓	
H. Any of the following controls are used on all Level 1 containers (NR 665.1087(3)(a)): 1. Container meets applicable US DOT packaging requirements. 2. A cover and closure devices form a continuous barrier over the container openings such that when they are secured, there are no visible holes, gaps or other open spaces into the container. 3. An organic-vapor suppressing barrier is placed on or over the hazardous waste in an open-top container so that the hazardous waste is not exposed to the atmosphere. Note: Level 1 standards do not apply to satellite accumulation or RCRA empty containers.	NA	662.034(1)(a)1
I. If Level 1 containers do not meet applicable US DOT packaging requirements, they are equipped with covers and closure devices composed of suitable materials that minimize exposure of hazardous waste to the atmosphere and maintain integrity of the covers and closure devices (NR 665.1087(3)(b)).		662.034(1)(a)1
J. If a Level 1 container is filled to the final level in one continuous operation, the closure device is promptly secured in the closed position when the filling operation is concluded (NR 665.1087(3)(c)1.a).		662.034(1)(a)1
K. If a Level 1 container is batch filled, the closure device is promptly secured in a closed position when the container is filled to the intended final level OR the batch loading is completed and any of the following first occurs (NR 665.1087(3)(c)1.b): 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.		662.034(1)(a)1
L. If a Level 1 container is opened to remove hazardous waste, the closure device is secured in the closed position upon completion of a batch removal AND when either of the following first occurs (NR 665.1087(3)(c)2b): 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.		662.034(1)(a)1
M. If access to the inside of a Level 1 container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity (NR 665.1087(3)(c)3).		662.034(1)(a)1
N. If a Level 1 container is equipped with a pressure relief device that vents to the atmosphere, ALL of the following conditions are met (NR 665.1087(3)(c)4): 1. The device is designed to operate with no detectable organic emissions (< 500 ppmv) when in the closed position. 2. The device is closed when the internal pressure is within the specified operating range. 3. The device opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.		662.034(1)(a)1



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Section 10: Subchapter CC Level 1 Container Standards

O. Safety valves are only opened to avoid an unsafe condition (NR 665.1087(3)(c)5).		662.034(1)(a)1
P. When a defect is detected, initial repair efforts are made within 24 hours of detection and completed within 5 calendar days (NR 665.1087(3)(d)3).		662.034(1)(a)1
Q. If repairs cannot be completed in 5 days of detecting the defect, the waste is removed from the container which is not used until it is repaired (NR 665.1087(3)(d)3).		662.034(1)(a)1

Section 11: Subchapter CC Level 2 Container Standards

A. The facility manages hazardous waste containers with a design capacity >119 gallons that are in light material service. If NO, go to Section 12.	NA	
B. Any of the following controls are used on Level 2 containers: (NR 665.1087(4)(a)) 1. Container meets applicable US DOT packaging requirements. 2. Each potential leak interface where organic vapor leakage could occur on the container, cover and closure device has been checked to determine that no detectable organic emissions (< 500 ppmv) are occurring. 3. The facility has demonstrated within the last 12 months that the containers are vapor-tight using Method 27 in appendix A of 40 CFR part 60.		662.034(1)(a)2
C. If the potential leak interface on the containers were checked, BOTH of the following were met: (NR 665.1087(4)(a)) 1. Checks were made on the interface of the cover rim and the container wall; the periphery of any opening on the container or container cover and its associated closure device; and, the sealing seat interface on a spring-loaded, pressure-relief valve. 2. The test was performed when the container was filled with a material having a VO concentration representative of the hazardous waste expected to be stored in the container.		662.034(1)(a)2
D. The facility maintains a copy of the procedure used to determine that containers >119 gallons in size that do not meet DOT requirements are not managing hazardous waste in light material service. (NR 665.1087(3)(e))		662.034(1)(a)2
E. Level 2 controls are used when transferring waste in or out of the container that minimize exposure to the atmosphere (submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(4)(b))		662.034(1)(a)2
F. If the container is filled to the final level in one continuous operation, the closure devices are promptly secured in the closed position when the filling operation is concluded. (NR 665.1087(4)(c)1.a.)		662.034(1)(a)2
G. If the container is batch filled, the closure devices are promptly secured in a closed position upon filling the container to the intended final level, or when the batch loading is completed and ANY of the following first occurs: (NR 665.1087(4)(c)1.b.) 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.		662.034(1)(a)2
H. If containers are opened to remove hazardous waste, closure devices are secured in the closed position upon completion of a batch removal and either of the following first occurs: (NR 665.1087(4)(c)2.b.) 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.		662.034(1)(a)2



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Section 11: Subchapter CC Level 2 Container Standards

I. If access to the inside of the container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity. (NR 665.1087(4)(c)3.)		662.034(1)(a)2
J. If the container is equipped with a pressure relief device that vents to the atmosphere, the device meets ALL of the following conditions: (NR 665.1087(4)(c)4.) 1. Designed to operate with no detectable organic emissions when in the closed position. 2. Closed when the internal pressure is within the specified operating range. 3. Opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.		662.034(1)(a)2
K. Safety valves are only opened to avoid an unsafe condition. (NR 665.1087(4)(c)5.)		662.034(1)(a)2
L. When a defect is detected, initial repair efforts are made within 24 hours of detection. (NR 665.1087(4)(d)3.)		662.034(1)(a)2
M. Repairs are completed within 5 days, or the waste is removed from the container which is not used until the defect is repaired. (NR 665.1087(4)(d)3.)		662.034(1)(a)2

Section 12: Subchapter CC Level 3 Container Standards

A. The facility manages hazardous waste in containers having a design capacity >26 gallons during a waste stabilization process when hazardous waste is exposed to the atmosphere. If NO, go to Section 13.	NA	
B. The container is vented directly through a closed-vent system to a control device, or the container is vented inside an enclosure which is exhausted through a closed-vent system to a control device. (NR 665.1087(5)(a))		662.034(1)(a)2
C. If the container is vented inside an enclosure, the enclosure is operated according to the criteria for permanent total enclosures found in Method 204 in appendix M of 40 CFR part 51. (NR 665.1087(5)(b)1.)		662.034(1)(a)2
D. Records for the most recent set of calculations and measurements verifying the enclosure meets the criteria for a permanent total enclosure in Method 204 in appendix M of 40 CFR part 51 are maintained at the facility. (NR 665.1090(4)(a))		662.034(1)(a)2
E. Level 3 controls are used when wastes are transferred in or out of the container that minimize exposure to the atmosphere (e.g., submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(5)(f))		662.034(1)(a)2

Section 13: Satellite Accumulation

A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 14.	✓	
B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area.	✓	662.034(3)(a)
C. Satellite containers are under the control of the operator of the process generating the waste.	✓	662.034(3)(a)



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Section 13: Satellite Accumulation

D. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	<input checked="" type="checkbox"/>	662.034(3)(a)1
E. If a container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	NA	662.034(3)(a)1
F. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	<input checked="" type="checkbox"/>	662.034(3)(a)1
G. Containers are marked "Hazardous Waste" or with other words that identify the contents.	<input checked="" type="checkbox"/>	662.034(3)(a)2
H. Container holding the excess waste is marked with the date the excess amount begins accumulating.	<input checked="" type="checkbox"/>	662.034(3)(b)
I. Generator complies with the 90 day accumulation requirements with respect to the excess amount within 3 days of it being generated.	<input checked="" type="checkbox"/>	662.034(3)(b)

Section 14: Waste Minimization

A. Generator includes waste minimization information in the annual report.	<input checked="" type="checkbox"/>	662.041(3)(e)
B. Generator has a program in place to reduce the volume or quantity and toxicity of waste to an economically practicable degree.	<input checked="" type="checkbox"/>	662.027(1)
Note: The inspector should look for evidence justifying the generator's waste minimization certification on the manifest. Also, EPA guidance recommends that the generator have a written waste minimization/pollution prevention plan.		

Section 15: Used Oil

A. Used oil is managed on-site. If NO, go to Section 16	<input checked="" type="checkbox"/>	
B. Used oil containing $\geq 1,000$ ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.	NA	679.10(2)(a)2
C. Used oil containers and tanks are in good condition and not leaking.	<input checked="" type="checkbox"/>	679.22(2)
D. Used oil containers and tanks are marked "used oil".	<input checked="" type="checkbox"/>	679.22(3)(a)
E. Transporter has an EPA ID number, except when generator self-transport or has a tolling agreement.	<input checked="" type="checkbox"/>	679.24

Code/Stat ? : C: Compliance CA: Compliance with Concern R: Returned to Compliance X: Non-Compliance NA: Inspected, Not Applicable ND: Inspected, Not Determined NI: Not Inspected
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Notes: *: Dept. approved alternate may apply No 'box' is an open ended question



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Section 15: Used Oil

F. If oil containing materials are disposed of as a solid waste, the used oil has been properly drained so there is no visible sign of free-flowing oil and a waste determination has been properly made.	<input checked="" type="checkbox"/>	679.10(3)(a)
G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met: 1. Only used oil from the generator or household do-it-yourselfers is burned. 2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less. 3. The combustion gases are vented to the ambient air.	<input checked="" type="checkbox"/> NA	679.23
H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.	<input checked="" type="checkbox"/> NA	679.11

Section 16: Universal Waste

A. The facility is a small quantity handler of universal waste (never accumulates more than 11,025 lbs). If NO, state in the comments section if the facility is a universal waste nonhandler, large handler or destination facility, and go to Section 17. Note: If the facility is a large handler, complete the large quantity handler of universal waste inspection form.	<input checked="" type="checkbox"/>	
B. Universal waste has not been disposed, treated or diluted. Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.	<input checked="" type="checkbox"/>	673.11
C. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and not leaking.	<input checked="" type="checkbox"/> NA	673.13
D. Universal waste lamps and pesticides are placed in closed, structurally sound containers that are compatible with the waste and are not leaking.	<input checked="" type="checkbox"/>	673.13
E. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".	<input checked="" type="checkbox"/>	673.14
F. Universal waste is accumulated for less than one year from the date generated or received from another handler.	<input checked="" type="checkbox"/>	673.15(1)
G. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.	<input checked="" type="checkbox"/> NA	673.15(2)
H. Length of accumulation time is demonstrated by any of the following: 1. Each container is marked or labeled with the earliest date the waste is generated or received. 2. The individual item of waste is marked or labeled with the date it was generated or received. 3. An inventory system identifying the date the waste was generated or received is maintained. 4. The universal waste is placed in a specific accumulation area identified with the earliest date the waste was generated or received.	<input checked="" type="checkbox"/>	673.15(3)
I. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.	<input checked="" type="checkbox"/>	673.16



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Section 16: Universal Waste

J. ALL of the following are met when a release occurs: 1. Release is immediately contained. 2. A waste determination is made. 3. Spill residue is disposed of properly as solid or hazardous waste.	NA	673.17
K. Handler sends the waste to a destination facility, foreign destination or another handler. Indicate the facilities in the comments section.	✓	673.18(1)
L. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.	NA	673.18(3)
M. The following activities have occurred. If YES, complete the Universal Waste Small Quantity Handler inspection form. 1. Universal waste are sorted or disassembled. 2. Recalled pesticides are managed. 3. Universal waste shipments have been rejected. 4. Universal waste shipments have included hazardous or solid waste. 5. Universal waste is self-transported.	NA	

Section 17: F006 Wastewater Treatment Sludge

A. Generator accumulates F006 sludge for more than 90 days. If NO, go to Section 18.	NA	
B. The F006 waste is accumulated for no more than 180 days, unless the waste is shipped 200 miles or more.		662.034(7)
C. Pollution prevention practices are in place to reduce the amount of contaminants entering the F006 waste.		662.034(7)(a)
D. The F006 waste is legitimately recycled through metals recovery.		662.034(7)(b)
E. No more than 20,000 kg (44,100 lbs) of F006 waste is accumulated on-site.		662.034(7)(c)
F. Accumulation containers meet subch. I, AA, BB and CC standards in ch. NR 665.		662.034(7)(d)1.a
G. The accumulation start date is clearly marked and visible for inspection on each container.		662.034(7)(d)3
H. Accumulation tanks meet subch. J, AA, BB and CC standards in ch. NR 665, except for NR 665.0197(3) and NR 665.0200.		662.034(7)(d)1.b
I. Each container and tank of F006 waste is clearly marked with the words "Hazardous Waste".		662.034(7)(d)4
J. A containment building used for accumulation meets subch. DD standards in ch. NR 665; a P.E. certification stating compliance with the design standards is in the operating record AND written procedures and documentation for emptying the unit within 180 days are on file.		662.034(7)(d)1.c

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Noncode ? : Y: Yes N: No UN: Unknown

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Notes : *: Dept. approved alternate may apply No 'box' is an open ended question

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Revision: 12/03/2012
WASTE & MATERIALS
MANAGEMENT PROGRAM

LARGE QUANTITY GENERATOR INSPECTION

Section 17: F006 Wastewater Treatment Sludge

K. The accumulation of F006 waste is included in the preparedness and prevention procedures, contingency plan and personnel training program.

662.034(7)(d)5

L. If waste is accumulated for up to 270 days, the generator must ship the waste over 200 miles for metals recovery.

662.034(8)

Section 18: Generator Status Evaluation

A. Waste is accumulated for less than 90 days, except as allowed in Sections 13 and 16.

662.034(1)

B. More than 2,205 lbs. of non-acute hazardous waste; 2.2 lbs. of acute hazardous waste; or, 220 lbs. of residue from cleanup of an acute hazardous waste spill is generated in any month (NR 662.190(1), NR 662.220(4)).

C. Describe other activities that the generator conducts at the facility (accumulation in tanks, recycling, 10-day transfer, transporter, used oil, treatment, storage, disposal, universal waste, etc.).

D. If waste was previously accumulated in a tank system, the generator performed EITHER of the following (NR 665.0197(1), NR 665.0197(2)):

1. Closure by removing or decontaminating waste residues, contaminated containment system components, soils, structures and equipment.

2. Initiated long-term care if all contaminated soils cannot be practicably removed or decontaminated.

662.034(1)(a)2